City of Oakley
A Place for Families in the Heart of the Delta

East Cypress Corridor Specific Plan Draft Supplemental EIR

August 21, 2008

State Clearinghouse #2004092011

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1.0 INTRODUCTION, SCOPE OF SEIR, AND EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Draft Supplemental Environmental Impact Report (Supplemental EIR) is prepared for the East Cypress Corridor Specific Plan in accordance with the California Environmental Quality Act (CEQA). The City of Oakley is the lead agency for the environmental review of the East Cypress Corridor Specific Plan project evaluated herein and has the principal responsibility for determining whether to approve the project. The Supplemental EIR is prepared pursuant to CEQA Guidelines Section 15163. In compliance with Sections 15163(a)(2)(b-e) this Supplemental EIR contains additions and revisions to the East Cypress Corridor Specific Plan EIR previously completed by the City.

1.2 SUMMARY OF THE CITY'S PRIOR ACTIONS WITH RESPECT TO THE PROJECT

On or about February 14, 2004, the City of Oakley determined that a specific plan should be prepared for the East Cypress Corridor area. As a result, the City authorized the preparation of the East Cypress Corridor Specific Plan for the development of approximately 2,546 acres of land in this area. An Environmental Impact Report (EIR) was prepared for the East Cypress Corridor Plan and, on March 13, 2006, the Oakley City Council (City Council) adopted Resolution No. 30-06 certifying the EIR. On that same date by Resolution 31-06, the City Council adopted the East Cypress Corridor Specific Plan, related General Plan amendments, and CEQA findings for the approvals.

1.3 SUMMARY OF LEGAL CHALLENGE TO THE CITY'S PRIOR APPROVALS

In April 2006, Greenbelt Alliance filed a petition for writ of mandate challenging the City Council's certification of the East Cypress Corridor Specific Plan EIR. On August 24, 2007, the Superior Court entered a judgment granting a peremptory writ of mandate in that case. The peremptory writ of mandate ordered the City Council to set aside its resolution certifying the EIR, its resolution approving the East Cypress Corridor Specific Plan and related General Plan amendments, and the findings the City Council had adopted under the provisions of CEQA in connection with its approval of the Project.

The Court's decision, which was incorporated in the judgment, determined that the EIR was legally deficient in two respects: (i) the EIR failed to comply with the tiering provisions of CEQA with respect to the EIR's discussion of impacts to agricultural resources; and (ii) the EIR did not adequately analyze the potentially significant air quality impacts of the Project's area source emissions. The judgment states that it was granted for the reasons stated in the decision, and specifically provides that "[i]n all other respects the petition is denied."

1.4 SUBSEQUENT ACTIONS BY THE CITY

In compliance with the peremptory writ of mandate issued by the court, on October 22, 2007, the City Council adopted Resolution No. 111-07, rescinding Resolution No. 30-06 which certified the EIR. Resolution No. 111-07 also rescinded Resolution 31-06 which had adopted the East Cypress Corridor Specific Plan, the related General Plan amendments and the CEQA findings the City Council had adopted in connection with its approval of the Project. Resolution No. 111-07 also provides that the City of Oakley will take no action to re-approve the East Cypress Corridor Specific Plan until the two deficiencies in the EIR have been corrected.

On October 26, 2007, the City issued a Notice of Preparation and Initial Study for a Supplemental Environmental Impact Report (Appendix A) that will address the specific legal deficiencies the Court had identified in its judgment and decision.

1.5 SUPPLEMENTAL EIR'S ANALYSIS

This Draft Supplemental EIR revises the discussion and analysis in the EIR previously completed for the East Cypress Corridor Specific Plan (1) by providing a discussion and analysis of impacts to Agricultural Resources which replaces Section 3.3 on Agricultural Resources in the EIR; and (2) by providing a discussion and analysis of impacts from area source emissions which augments the discussion of Air Quality impacts in Section 3.4 of the EIR.

The City has determined that these revisions to the EIR do not affect the discussion and analysis of the other environmental issues covered in the EIR, and thus no revisions or additions to the other parts of the EIR are included in this Supplemental EIR.

This Draft Supplemental EIR will be available for review and comment for 45 days. At the conclusion of the comment period, written responses to comments on the Draft Supplemental EIR will be prepared by the City as provided by CEQA, and a Final Supplemental EIR will be completed. The EIR as revised by the Final Supplemental EIR will then be presented to the City Council for review and determination whether to certify that the EIR as revised by the Supplemental EIR has been completed in compliance with CEQA and with the judgment issued by the court. Upon certification of the EIR as revised, the City Council will consider whether to reapprove the East Cypress Corridor Specific Plan and related General Plan amendments.

1.6 SUPPLEMENTAL EIR PROCESS

The City of Oakley issued a Notice of Preparation and Initial Study for the Supplemental EIR on October 26, 2007. The City mailed the first Notice of Preparation to the State Clearinghouse, surrounding cities, all owners of property in and within 300 feet of the project boundary, and other interested parties for a 30-day review period. A copy of the Initial Study and Notice of Preparation are included as Appendix A to this SEIR.

The City of Oakley held a public scoping meeting to solicit input from the public at large regarding the two environmental issues evaluated in the Supplemental EIR. The public scoping meeting was held by the City of Oakley on November 14, 2007. While no one who attended the scoping meeting

commented on the two Supplemental EIR topics, two people did attend to discuss a road realignment unrelated to the current project.

A copy of the City's General Plan, the East Cypress Corridor Specific Plan, the EIR and all related documents are available for review at the City of Oakley, Community Development Department, 3231 Main Street, Oakley, California.

1.7 ORGANIZATION OF THE DRAFT SUPPLEMENTAL EIR

The Draft Supplemental EIR is organized into the following sections:

Chapter 1.0 – Introduction, Scope of Supplemental EIR, Executive Summary

Provides an introduction and overview describing the intended use of the Draft Supplemental EIR and the review and certification process, as well as summaries of the chapters included in the Draft Supplemental EIR and summaries of the environmental resources that will be impacted by the project.

Chapter 2.0 – Project Description

Provides a description of the proposed project, including its location, background information, major objectives, and technical characteristics.

Chapter 3.0 – Environmental Setting, Impacts and Mitigation Measures

Contains the discussion and analysis of the two environmental issues included in the Supplemental EIR along with a discussion of mitigation measures.

Chapter 4.0 – EIR Authors / Persons Consulted

Lists report authors who provided technical assistance in the preparation and review of the Draft EIR.

Chapter 5.0 – References

Provides bibliographic information for all references and resources cited.

Appendices

The Appendices includes various documents referenced in this Draft Supplemental EIR, as follows:

Appendix A -- Notice of Preparation and Initial Study

Appendix B -- Figures Referenced in this Supplemental EIR

Appendix C -- Background Information Relating to Agricultural Resources

1.8 DEFINITIONS

The following bold and capitalized terms shall have the following meanings unless the context in which they are used clearly requires otherwise:

"City" means the City of Oakley, California

"County" means the County of Contra Costa, California

"CEQA" means the California Environmental Quality Act, as amended January 1, 2005, §§21000-21178, Public Resources Code, State of California

"CEQA Guidelines" means the Guidelines for California Environmental Quality Act as amended December 1, 2007, §§15000-15387, California Code of Regulations Title 14, Chapter 3

"EIR" means the East Cypress Corridor Specific Plan Environmental Impact Report

"General Plan" means the general plan of the City of Oakley, adopted December 16, 2002, and as amended from time to time

"Project Area" means the 2,546-acre East Cypress Corridor Specific Plan

"State" means the State of California

"Supplemental EIR" means this Supplemental Environmental Impact Report

1.9 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION

Under CEQA, a significant effect on the environment is defined as a substantial or potentially substantial adverse change in any of the physical conditions within the areas affected by the project. The following table summarizes the environmental impacts and mitigation measures addressed in this SEIR:

Table 1-1
Summary of Impacts and Mitigation Measures Discussed in this SEIR

Impact	*Level of Significance Prior to Mitigation*	*Mitigation Measures*	*Level of Significance after Mitigation*
3.1 AGRICULTURAL RESOURCES			
Conversion of important farmland within Planning Areas 1,3 and 4	Significant	No mitigation measures are available that would compensate directly for, or otherwise mitigate, the loss of agricultural land due to the conversion of the Specific Plan area to developed uses.	Significant
Conversion of important farmland within Planning area 2 and 5	No Impact	None required	No Impact
Conversion of important farmland within Planning area 6	Less Than Significant	None required	Less Than Significant
Conflicts with agricultural zoning or with Williamson Act contracts	No Impact	None required	
Other changes to environment that could result in conversion of agricultural land to non-agricultural use	Less Than Significant	None required	Less Than Significant
3.2 AIR QUALITY			
Post construction (operational) area source emissions	Significant	Mitigation Measure 3.2-1. All development shall be required to implement the following measures for reducing area source emissions: Eliminate wood burning fireplaces or devices. Install a gas outlet in proposed outdoor recreational fireplaces or pits. Offer as an option on homes to install a gas outlet for use with outdoor cooking appliances, such as a gas barbeque. Use efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units that meet or exceed Title 24 requirements (Title 24, Part 6, Energy Efficiency Standards for Residential and Nonresidential Buildings). Use window glazing and insulation, wall insulation, and efficient ventilation methods. Install electrical outlets on the exterior walls of both the front and back	Significant

Table 1-1
Summary of Impacts and Mitigation Measures Discussed in this SEIR

Impact	*Level of Significance Prior to Mitigation*	*Mitigation Measures*	*Level of Significance after Mitigation*
		of all commercial buildings and residences to promote the use of electric landscape maintenance equipment. Landscape with drought resistant and low maintenance species of plants, trees, and shrubs to reduce the demand for gas powered landscape maintenance equipment. Use low VOC and low formaldehyde architectural coatings and insulation. Provide educational materials to homebuyers about the environmental benefits of using low VOC architectural coatings to help promote consumer use. Provide a 220-volt utility drop or other dedicated outlet that is adaptable for use by electric or rechargeable hybrid vehicles that are generally available to consumers.	
Post construction (operational) area source emissions combined with vehicle emissions		See Mitigation Measures 3.4-1, 3.4-2 in EIR and 3.2-1, above.	Significant

2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter describes the components of the proposed East Cypress Corridor Specific Plan, as well as the background, location, project objectives, and required approvals for the proposed project.

2.2 PROJECT BACKGROUND

Oakley General Plan

Prior to incorporation of the City of Oakley, Contra Costa County was responsible for planning and land use in the Oakley community, including the proposed Project Area. The Contra Costa County General Plan was adopted in July of 1996. After the City of Oakley was incorporated in July 1999, the City adopted the County General Plan and Zoning Ordinance.

Subsequently, after incorporation the City of Oakley embarked on preparation and processing of a new General Plan to specifically serve the needs of the City. In December 2002, the City of Oakley adopted its own General Plan – The Oakley 2020 General Plan. An Environmental Impact Report (EIR) for the General Plan was adopted and certified concurrently with the adoption of the Oakley 2020 General Plan.

As anticipated by the General Plan, a large portion of the East Cypress Corridor Specific Plan was annexed into the City of Oakley in 2006. However, a small portion of the site along the north and east project boundary remains in the unincorporated area of Contra Costa County. The portion of the East Cypress Corridor Specific Plan that has been annexed into the City has also been annexed into the Contra Costa Water District and the Diablo Water District.

2.3 EXISTING GENERAL PLAN DESIGNATIONS

The area covered by the East Cypress Corridor Specific Plan is designated by the Oakley 2020 General Plan for a variety of land uses including: Agricultural Limited; Single Family Residential High; Single Family Medium; Single Family Low; Single Family Very Low; Multi-Family Low; Commercial; Commercial Recreation; Parks and Recreation; Public and Semi-Public. The City of Oakley General Plan land use designations for the project site are shown in EIR Figure 2-2, Oakley 2020 General Plan Land Use Designations.

2.4 DESCRIPTION OF THE EAST CYPRESS CORRIDOR SPECIFIC PLAN

The East Cypress Corridor Specific Plan site is located in eastern Contra Costa County as shown in EIR Figure 1-1, Regional Location Map. More specifically, the project is located east of the City of Oakley as shown in EIR Figure 1-2, Local Vicinity Map. The project totals approximately 2,546 acres and includes vacant land, agricultural land, single-family homes, commercial use, overhead power lines, natural gas wells, natural gas pipelines, irrigation canals, and the Summer Lake (formerly

Cypress Lake and Country Club) project, which is currently under construction. The topography of the project site and the surrounding area is shown in EIR Figure 1-3, USGS Topographic Map. An aerial photograph of the site and the area immediately surrounding the site is shown in EIR Figure 1-4, Aerial Photograph.

The purpose of the East Cypress Corridor Specific Plan is to provide the City of Oakley with a mechanism to control development within the Specific Plan area, ensuring that a comprehensive land plan is adopted which promotes the development of a livable community designed for compatible neighborhoods and connectivity to parks, open space, schools, and commercial services. The Specific Plan will also provide the City of Oakley with a mechanism to manage growth leading to the installation of adequate infrastructure and public services for the new and existing neighborhoods within the Specific Plan Area.

The East Cypress Corridor Specific Plan establishes the land use, infrastructure plan, development regulations, and design guidelines which will govern development of a master planned community offering a variety of residential housing types within an open space setting. A network of multi-purpose trails, on-street bike lanes, and pedestrian corridors provides bicycles and pedestrian access linking residential and commercial areas. Bicycle and pedestrian accessibility is also provided between the residential development and the planned elementary and middle school sites distributed throughout the Specific Plan Area.

The East Cypress Corridor Specific Plan proposes planned development of mixed-uses for the 2,546-acre site. The project proposes to allow up to 5,609 residential units (detached and attached units), 92.6 acres of commercial use (638,600 square feet), 52.6 acres of public schools (2 elementary, one middle), 152.3 acres of man-made lake, 190 acres of open space/easements, 20.5 acres of existing and proposed gas well sites, 122.1 acres of wetlands/dunes, 112.5 acres of flood-control levees (46,100 linear feet), 101.7 acres of parks (neighborhood and community), 5.7 acres of light industrial use (166,356 square feet), 37.3 acres of commercial recreation (162,500 square feet) and a 6-acre beach club. (Note that 150 residential units may replace up to 20 acres of the 40 net acres of the Village Center site, which results in a maximum development of 5,759 residential units.) The land use plan is shown in EIR Figure 1-5, East Cypress Corridor Specific Plan Land Use Plan Map.

3.0 Environmental Setting, Impacts and Mitigation Measures

3.1 AGRICULTURAL RESOURCES

3.1.1 INTRODUCTION

This chapter discusses the status of the existing agricultural land resources within the Specific Plan area and the effects of converting agricultural land within the site to urban uses.

The discussion and analysis in this chapter relies on and incorporates by reference the discussion and analysis of agricultural land impacts set forth in the environmental impact report completed by the City of Oakley for the Oakley 2020 General Plan, referred to in this SEIR as the General Plan. The EIR for the General Plan was certified by the Oakley City Council on December 16, 2002, and is referred to in this SEIR as the General Plan EIR.

This section 3.1 on Agricultural Resources replaces section 3.3 of the Specific Plan EIR relating to Agricultural Resources.

The General Plan EIR was prepared as a Program EIR pursuant to the provisions of section 15168 of the CEQA Guidelines to evaluate environmental impacts resulting from the development implementing the General Plan. In relying on the General Plan EIR's discussion and analysis as provided by Guidelines section 15168, this SEIR uses CEQA's "tiering" concept.

The discussion and analysis of agricultural land impacts in the General Plan EIR is summarized in this SEIR. A copy of the General Plan and the General Plan EIR can be examined at the City of Oakley, Community Development Department, 3231 Main Street, Oakley, California, and is also posted on the City's website at www.ci.oakley.ca.us.

3.1.2 RELATIONSHIP BETWEEN THE GENERAL PLAN EIR AND THE DISCUSSION AND ANALYSIS IN THIS SECTION OF THIS SEIR

Under CEQA's tiering concept, when an EIR has been prepared for a plan such as a general plan, the EIR on a later project that is consistent with the plan can rely on the analysis of particular environmental impacts provided in the plan EIR, thereby limiting the analysis in the later EIR to significant environmental impacts that were not previously addressed. In accordance with the provisions of CEQA Guideline §15168, a program EIR prepared for a general plan is one of the types of EIRs that may be relied on to address proposed actions that are consistent with the general plan.

CEQA Guideline section 15168(c) provides that, when a program EIR is to be used for subsequent activities in the program, those subsequent activities "must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared." If, based upon this examination, the agency finds, pursuant to Guideline section 15162, that "no new effects

could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required." Guideline section 15168(c)(2).

Guideline section 15162 in turn provides that once an EIR has been prepared for a project, a subsequent EIR shall not be prepared for the project unless the lead agency determines that substantial changes in the project, substantial changes in circumstances, or new information of substantial importance requires an additional environmental analysis for one or more the reasons described therein.

In addition, under the provisions of Guideline section 15168(d), when an agency prepares an EIR on later parts of the program, the program EIR can be used to simplify the task of preparing such an EIR. Under subsection 15168(d)(3), the program EIR can "Focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before."

In accordance with these provisions of the CEQA Guidelines, the following discussion examines the Specific Plan in light of the General Plan EIR's discussion and analysis of agricultural resources issues to determine whether any significant effects relating to agricultural resources not considered in the General Plan EIR will result from implementation of the Specific Plan.

The discussion first describes the setting for the Specific Plan and discusses the effect implementation of the Specific Plan will have on agricultural land. This is followed by a summary of the analysis of impacts to agricultural land in the General Plan EIR. The discussion then compares the effects on agricultural land expected to result from the Specific Plan with the assessment in the General Plan EIR in order to determine whether the Specific Plan will result in any new significant effects not identified in the General Plan EIR.

3.1.3 ENVIRONMENTAL SETTING

The discussion below assesses the agricultural resources within the Specific Plan area by describing existing agricultural uses, classifications under the Farmland Monitoring and Mapping Program, soil ratings, application of the Land Evaluation and Site Assessment model, and Williamson Act contract status.

Description of current uses and farmland classifications under the Farmland Monitoring and Mapping Program.[1]

The Specific Plan area totals approximately 2,546 acres. The existing agricultural use within the Specific Plan area is cattle grazing, including limited irrigated pasture for cattle grazing. No cultivation of crops, orchards, or other farming uses is currently occurring within the Specific Plan area. The three largest parcels of land under single ownerships have been used for cattle grazing for at least the past thirty years. The rest of the Specific Plan area is either developed, in public utility right of way, or entitled for development, some of which is under construction.

[1] Important Farmland Maps for California are compiled by the State Department of Conservation using these criteria together with land use information. The Important Farmland Maps use seven categories for classifying land: prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, grazing land, urban and built-up land and other land. The first three categories (prime, statewide, and unique farmlands) are considered "important farmland" and also meet the definition of agricultural land under CEQA (Section 21060.1).

Current uses within each of the Specific Plan Planning Areas, and the amount of acreage devoted to each use, are described below. Where appropriate, the acreages of agricultural land per the Department of Conservation's Farmland Monitoring and Mapping Program (FMMP) are provided (2007 FMMP data set). Soil type descriptions are from the 2002 Soil Survey Geographic (SSURGO) Database. FMMP classifications are depicted in Figure 1 in Appendix B.

Planning Area 1: Area 1 includes approximately 704 acres, currently used for cattle grazing. A total of 387 acres are mapped as prime farmland (located mainly on Sacramento clay and Egbert mucky clay loam soils). Another 42 acres are identified as farmland of statewide importance and 259 acres are identified as farmland of local importance, with the balance composed of "other" and urban or built-up land.

Planning Area 2: No agricultural uses currently exist on the site of Planning Area 2 and the site has been graded. This 409-acre area was previously approved for residential development by Contra Costa County.

Planning Area 3: Planning Area 3 includes areas used for cattle grazing. A total of 120 acres, located on Sacramento clay soils, are identified as prime by the FMMP, 3 acres are identified as farmland of statewide importance, and 49 acres as farmland of local importance. Of the remaining 10 acres, 8 are classified as "other lands" and 2 acres are urban or built-up land. The total area is approximately 182 acres.

Planning Area 4: Planning Area 4 is, along with Planning Areas 1 and 3, the other planning area currently in agricultural use (cattle). Area 4 is approximately 341 acres. A total of 58 acres are mapped as prime farmland, located on Egbert mucky clay loam. Another 218 acres are identified as farmland of statewide importance, 2 acres are identified as unique farmland, and 63 acres as farmland of local importance. The remaining 10 acres are variously described as "water" or grazing land by the FMMP.

Planning Area 5: No agricultural use currently exist on the site of Planning Area 5. The 269 acre area was previously approved for residential development by Contra Costa County. Planning Area 5 is currently being developed by Shea Homes as the Summer Lake South residential community.

Planning Area 6: The 631 acres within Planning Area 6 consists of existing residential and agricultural uses to be maintained and served by new public facilities and services planned to be provided as part of the development of the Specific Plan. According to the FMMP, 175 acres of this 631-acre area are classified as urban and built-up land. The remaining land is vacant land, most of which is identified as farmland of local importance (364 acres). There are 38 acres classified as "important farmland" (8 acres of prime farmland, 29 acres of farmland of statewide importance, and 1 acre of unique farmland). The remaining acreage is classified as "other" land or water.

Thus, in summary, the Specific Plan area totals approximately 2,546 acres. Excluding the Planning Areas which have been previously approved for development, are graded, and/or currently under development (Planning Areas 2 and 5, known as Summer Lake), the Specific Plan area is approximately 1864 acres. The Important Farmland Map for Contra Costa County prepared pursuant to the state Department of Conservation's Farmland Mapping and Monitoring Program classifies approximately 572 acres of land within the Specific Plan area as prime farmland, 292 acres

as farmland of statewide importance, 2 acres as unique farmland, and 735 acres as farmland of local importance. Another 19 acres is identified as water, which includes drainage and detention features. The remaining 244 acres is identified as urban land and "other" land that includes rural residential land, land entitled for urban development, or vacant land that does not fit into one of the other categories. Most of the urban and "other" land is located in Planning Area 6, which includes many rural residential and other small developments.

It should be noted that under the Farmland Mapping and Monitoring Program's farmland mapping classifications, to be classified as Prime Farmland or Farmland of Statewide Importance, the land must have certain soil characteristics and must have been used for irrigated agricultural production at some time during the four years prior to the mapping date; to be classified as Unique Farmland the land must have been cropped at some time during the four years prior to the mapping date. As indicated above, however, none of the land within the Specific Plan Area has been used for production of crops within the four years prior to mapping date. Much of the land has been used for cattle grazing. Hay for cattle feed is grown in portions of Planning Areas 1, 3 and 4, but these areas are uncultivated.

Classification of Soils Within the Specific Plan Area

The near-surface soils within the Specific Plan Area are described in Table 3.1-1 and the soil capability classification and Storie Index Rating and Storie Index grade for each of these soils is listed. (These soil classification systems are explained in Appendix C.)

Table 3.1-1
On-site Soil Capability Classification and Storie Index Rating

Soil Map Symbol and Name	Soil Capability Classification	Storie Index Rating	Grade
Egbert mucky clay loam (Ea)	IIIw-2(16)	32	4
Rindge muck (Rd)	IIIw-10(16)	40	3
Ryde silt loam (Rh)	IIIw-2(16)	50	3
Sacramento clay (Sa)	IIIw-5(16)	49	3
Delhi sand, 2 to 9 percent slopes (Dac),	IIIs-4(17)	49	3
Kingile muck (Kb),	III-w-10(16)	32	4
Piper loamy sand (Pe),	IVw-4(16)	32	4
Sacramento clay, alkalai (Sb),	IVw-6(17)	39	4
Shima muck (Se)	IIIw-10(16)	32	4
Marcuse clay (Mb)	IVw-6(17)	16	5
Piper fine sandy loam (Ph)	IVe-9(16)	23	4

Source: USDA Soil Conservation Service, Soil Survey of Contra Costa County, 1977.

As shown in the table none of the soils qualify as higher quality soils by having a Soil Capability Classification of I or II, or a Storie Index Rating of greater than 50. All of the soils are classified as having severe to very severe limitations under the Soil Capability Classification system and as poor or fair quality under the Storie Index Rating system. (See Appendix C for an explanation of these rating systems).

In its farmland mapping program, the California Department of Conservation generally considers soils in the first four categories (Ea, Rd, Rh, and Sa) as prime farmland when the land has been used for irrigated agricultural production at some time during the four years prior to the mapping date, and it considers soils in the next five categories (Dac, Kb, Pe, Sb, and Se) as Farmland of Statewide Importance when it has been used for irrigated agricultural production during the prior four years.

Williamson Act Contract

Under the provisions of the Williamson Act, private landowners may contract with counties and cities to restrict their land to agricultural and open space uses, and the restricted land is assessed for property tax purposes at a rate consistent with its actual use, rather than potential market value. None of the property within the Specific Plan area is in a Williamson Act contract. In addition, no Williamson Act parcels are located within ¼ mile of the project area.

3.1.4 Regulatory and Planning Setting

County Planning

The Specific Plan area was planned for conversion from agricultural to urban uses by the County before the City of Oakley incorporated and adopted a General Plan. The area was planned for conversion to urban uses consistent with the Contra Costa County 65/35 Land Preservation Standard adopted by County voters as Measure C-1990. This standard limits urban development to no more than 35 percent of the land in the County and preserves at least 65 percent of land in the County for agriculture, open space, wetlands, parks and other non-urban uses. The 65/35 Standard operates on a Countywide basis and therefore includes urban and non-urban uses within cities as well as unincorporated areas. (County General Plan, Land Use Element, at 3-11).

The Urban Limit Line, also created by Measure C-1990, works to enforce the 65/35 Land Preservation Standard by establishing a line beyond which no urban land uses can be designated. Properties that are located outside the ULL may not obtain General Plan Amendments that would re-designate them for an urban land use. In addition, those properties outside the ULL may be subject to various agricultural and open space preservation measures that may be considered by the County and incorporated in zoning ordinances. (County General Plan, Land Use Element, at p. 3-8)

A key purpose of the 65/35 Land Preservation Standard and the ULL is to preserve the long term viability of the County's agricultural and open space land. This reflects the long-term planning strategy that important agricultural and open space land in the County can best be preserved by channeling growth to the 35% of the land in the County identified as urban development areas, which will in turn relieve pressure for urban development to occur in the remaining 65% of the land in the County identified as preservation areas.

Consistent with the 65/35 Land Preservation Standard, the Conservation Element policies in the County General Plan call for preservation of areas highly suited to prime agricultural production and adherence to the 65% standard for non-urban uses. (County General Plan, Conservation Element, p. 8-3.) The agricultural resources policies in the County General Plan call for urban development to occur within the Urban Limit Line. (*Id.* at p. 8-23.)

The Specific Plan Area is included within the Urban Limit Line which has the effect of identifying it as an urban development area. With respect to the Specific Plan area, the Land Use Element of the County General Plan adopted in 1996 provided for development of the Specific Plan area with up to 3,000 residential units (Policy 3-72) in addition to the 1,330 units the County had previously approved for the Summer Lake project in 1993.

The County recently updated its General Plan, with no change to the land uses and development policies for the area covered by the Specific Plan.

City of Oakley General Plan

Under the City's General Plan, like the County General Plan, the focus for long-term preservation of productive agricultural land is the area outside the Urban Limit Line and outside the 35% urbanization area. The corollary to such preservation is efficient use of lands for development within the development areas. Reflecting its marginal agricultural status, the Specific Plan area is planned for development under the City General Plan as it is under the County General Plan.

The Oakley General Plan's overall goal relating to agricultural land is to "Allow agriculture to continue as a viable use of land that reflects the community's origins and minimizes conflicts between agricultural and urban uses." (Goal 6.1) This goal is designed to preserve the important features of the City's agricultural heritage without obstructing the other goals of the General Plan providing for urban development. It reflects the fact that the City's Planning Area is an urban development area rather than a preservation area. The General Plan's policies relating to agricultural land are intended to encourage preservation of the City's agricultural heritage without impeding the urban development planned in the Plan's Land Use Element.

The Oakley General Plan Land Use Map designates most of the Specific Plan area for various types of residential and commercial uses, as well as agricultural limited, commercial recreation, parks and recreation, waterways, roads, and public/semi-public uses. As part of the project, the General Plan will be amended to designate the entire specific plan area to SP, which will use the designations adopted in the specific plan as the General Plan land use designations. The Specific Plan proposes a total of 272 acres designated "agriculture limited," a designation which provides for limited agricultural and very low density residential uses. Most of the agricultural limited areas (258 acres) are located in Planning Area 6, where they have been applied to existing rural residential uses and vacant agricultural lands which have not been identified for additional development under the Specific Plan. The purpose of the Agriculture Limited (AL) designation is to accommodate light agriculture including vineyards, orchards, and row crops, animal husbandry and very low-density residential uses—reflections of the historic and continuing agrarian practices within Oakley. Primary land uses may include single-family residences, secondary residential units, and limited agriculture and animal husbandry, subject to developmental and operational standards. See East Cypress Corridor Specific Plan Table 1. Other designations proposed in the specific plan are consistent those in the General Plan, as well as more separated within some categories.

3.1.5 SUMMARY OF DISCUSSION OF AGRICULTURAL LAND IMPACTS IN THE GENERAL PLAN EIR.

The General Plan EIR, completed in 2002, included a discussion and evaluation of the impacts of implementation of the General Plan on agricultural land. That discussion and evaluation which is set forth on pages 3-68 through 3-69 and 3-75 through 3-77 of the draft EIR, and pages 4-23 through 4-27 of the responses to comments in the Final EIR, is summarized below.

Based upon Appendix G of the CEQA Guidelines, the General Plan EIR examined whether the General Plan would have significant effects on agricultural land by considering whether it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act Contract.
- Involve other changes to the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

The General Plan EIR explained that while agriculture has been a predominant industry in Contra Costa County since 1940, agricultural lands and agricultural production have declined due to declining agricultural profit, disease, soil condition, lack of water and urbanization. Rangelands and field crops have been reduced by more than half since 1940. Within the City of Oakley, remnant vineyards and orchards have become constrained by a patchwork of urban uses. The EIR noted that the viability of commercial agriculture within Oakley has been compromised by the lack of large contiguous blocks of agriculture and urban encroachment. It also concluded that agricultural resources within the City's Planning Area are fragmented and commercial agriculture is substantially compromised.

The General Plan EIR also recognized that the entire Oakley Planning Area is located within the County's Urban Limit Line and is identified as an urban development area. Implementation of the Oakley General Plan would carry out the County-wide land use strategy of the 65/35 Land Preservation Plan by completing the urbanization of the area as planned by the County.

The General Plan EIR described the City's interest in preserving aspects of the City's agricultural heritage. Private parcels of land that continue in agricultural production help to preserve the traditional rural character of the community, maintain open space, and reduce congestion within the City. However, the EIR also noted that "While the City recognizes the historic role of agriculture within the Oakley community and supports continued agriculture, the transition from agriculture to urban uses limits the potential for large-scale commercial agriculture within Oakley." As a result, the General Plan includes policies that accommodate agricultural uses while at the same time providing for balanced development within the City.

The General Plan EIR also explained that within Oakley, agricultural land is planned for and accommodated in two General Plan land use designations: the Agricultural Limited designation which provides locations for limited agricultural and very low density residential uses, and the Delta Recreation designation, which encompasses the lowlands of the San Joaquin Delta at the City's

northern edge, most of which is located within the 100-year flood plain. These land use designations reflect the General Plan's overall goal relating to agricultural land which is to: "Allow agriculture to continue as a viable use of land that reflects the community's origins and minimizes conflicts between agricultural and urban uses." (Goal 6.1) This goal is designed to preserve the agricultural heritage of the Planning Area without obstructing the other goals of the General Plan and its land use designations providing for urban development. A variety of Policies and Programs were included in the General Plan to advance the goal of preserving the agricultural heritage of the area. Nineteen of such policies and programs are identified in the EIR. The policies and programs applicable to this project are listed in Section 3.3.6, below.

The General Plan EIR assumed in evaluating impacts that "all existing vacant land will be converted at General Plan buildout to the land uses identified on the General Plan Land Use Diagram." (p. I-5) Through the General Plan EIR, the City identified the agricultural potential for the planning area and determined that the potential was constrained. The EIR further recognized that the policies and programs in the General Plan related to agricultural land would help to preserve the agricultural heritage of the City consistent with the Plan's goals and policies relating to urban development. The EIR concluded that, in light of these factors, coupled with the constraints on the viability of commercial agriculture in the planning area covered by the General Plan, and the long-standing designation of the planning area for development, the impacts relating to conversion of agricultural land would be less than significant.

The General Plan EIR analyzed the potentially significant impacts of converting agricultural lands in the "expansion areas," including the Cypress Corridor Expansion Area (what is now the Specific Plan Area) to urban uses. The General Plan EIR described the "expansion areas" as containing "prime agricultural lands," but also described the existing setting as one undergoing a "transition from agriculture to urban uses" which "limit[ed] the potential for large-scale commercial agriculture within Oakley." The EIR concluded that the agriculture-related General Plan Policies and Programs listed in the EIR would "satisfy" the City's goal of "preserving the agricultural heritage of the [General Plan] Area." The General Plan EIR found that "[t]he incremental effect of the Proposed General Plan on agriculture is determined to be less than significant upon implementation of the [listed] Policies and Programs."

3.1.6 SPECIFIC PLAN'S CONSISTENCY WITH GENERAL PLAN POLICIES AND PROGRAMS RELATING TO AGRICULTURAL LANDS

The General Plan Policies and Programs identified in the General Plan and the General Plan EIR related to agricultural lands that are applicable to the project include the following:

- General Plan Goal 6.1: "Allow agriculture to continue as a viable use of land that reflects the community's origins and minimizes conflicts between agricultural and urban uses."

The East Cypress Corridor Specific Plan allows existing agriculture areas adjacent to the project site, within the County's agricultural and open space land, to continue as viable use of land. Contra Costa County's 65/35 Land Preservation Standard preserves at least 65 percent of land in the County for agriculture, open space, wetlands, parks and other non-urban uses. The nearby agricultural lands within the 65 percent agricultural and open space lands are separated from the project area by both

regulatory and physical features. The regulatory separation is the Urban Limit Line. In addition, a number of physical features serve as buffers between the Specific Plan Area and current agricultural uses. The Specific Plan Area is bounded to the south and southwest by Rock Slough and the Contra Costa Water District Canal, to the east by Sand Mound Slough, and to the north by Dutch Slough. Jersey Island Road and the proposed levee system stand between the Specific Plan Area and the 1200-acre Dutch Slough property owned by the California Department of Water Resources (DWR). New interior levees would be constructed adjacent the Contra Costa Canal and Rock Slough in the south and southwest, and along the east side of Summer Lake. On Sandmound Slough, the agricultural uses to the east are further separated by existing uses, primarily water recreational. The new housing units in Planning Areas 2, 4 and 5 would be buffered by the low density uses in Area 6. Nearby agricultural uses would not be significantly affected by the project because of these buffers, and those agricultural uses could continue without being adversely affected by the project. The buffers also serve to minimize conflicts between agricultural and urban uses between the specific plan area, and the agricultural areas outside of the specific plan.

The East Cypress Corridor Specific Plan proposes over 272 acres of land to be designated as AL (Agricultural Limited). The AL designation has a maximum density of 1.0 unit per acre and allows for agricultural uses as listed in the Oakley Municipal Code section 9.1.402 (Limited Agricultural District). The purpose of the Agriculture Limited (AL) designation is to accommodate light agriculture including vineyards, orchards, and row crops, animal husbandry and very low-density residential uses—reflections of the historic and continuing agrarian practices within Oakley. The Agricultural Limited land uses reflect the community's agrarian origins. The Agricultural Limited designation allows modified agricultural practices that minimize impacts on adjacent land uses, along with equestrian and livestock uses, subject to limits. The limited agricultural use minimizes conflicts between agricultural and urban uses within the specific plan area.

Adoption of the specific plan will advance regional programs that promote the long-term viability of agricultural operations within the County consistent with the County's 65/35 Land Preservation Standard, Adoption of the Specific Plan will advance the long-term Countywide strategy for protection of agricultural resources in two ways: First, by allowing development in a designated development area -- the East Cypress Corridor area -- it will help to reduce pressures for growth and development in identified non-urban preservation areas, including important agricultural land within those preservation areas. And second, through the requirement that development within the Specific Plan Area fund acquisition of land to be protected under the recently adopted East Contra Costa County Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP). While the purpose of the HCP/NCCP is to protect and manage undeveloped land as habitat for threatened and endangered species, the HCP/NCCP will conserve a significant quantity of agricultural land in Eastern Contra Costa County. The East Cypress Corridor Specific Plan is subject to the HCP/NCCP. Under the HCP/NCCP, any future development will be required to pay a per-acre fee towards the land acquisition and other goals of the HCP/NCCP. This per-acre fee is imposed on each developed acre within the Specific Plan. Of the approximate 80,000 acres targeted for acquisition by the HCP/NCCP, over 95% is classified prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, or grazing land.

- General Plan EIR, Land Use Element Policy #2.2.5: "Promote the transition from higher density centers to lower densities at City boundaries. Where high density residential is

directly adjacent to low density residential or agricultural uses, buffers should be provided."

The specific plan land use plan was designed with a village commercial located in the center of the project site, which is surrounded by residential land uses, schools, parks, and a meandering system of lakes, trails and open space. The highest density allowed in the Specific Plan area is 12 units per acre in the Multi-Family Medium Density designation. There are 42 acres of Multi-Family Medium designated land, consolidated within Area IV. The Multi-Family Medium site is surrounded by open space corridors and neighborhood parks, which act as buffers in accordance with this General Plan policy. The higher density in the central areas of the specific plan transitions to lower densities and open space corridors at the City's boundaries.

- General Plan Open Space and Conservation Element Policy #6.1.2 "Reduce the negative impacts resulting from urban uses and neighboring agricultural uses in close proximity," and General Plan Open Space and Conservation Element Policy 6.1.4: "Incorporate parks, open space, and trails between urban and agricultural uses to provide buffer and transition between uses."

A number of physical features serve as buffers between the Specific Plan Area and agricultural uses in close proximity. The Specific Plan Area is bounded to the south and southwest by Rock Slough and the Contra Costa Water District Canal, to the east by Sand Mound Slough, and to the north by Dutch Slough. Jersey Island Road and the proposed levee system stand between the Specific Plan Area and the 1200-acre Dutch Slough property owned by the California Department of Water Resources (DWR). The waterways and trail system along the levees form open space buffers between urban and agricultural uses.

- General Plan Open Space and Conservation Element Program #6.1.A; "Identify and map those properties that include prime productive agricultural soils (Class I and II capability according to the U.S. Soil Conservation Service) for use in the review of development applications."

This SEIR for the project has identified and discussed all applicable properties that include agricultural soils classified as prime farmland. The mapping of farmland within the Specific Plan area is shown on Figure 1, included in Appendix B of this SEIR.

- General Plan Open Space and Conservation Element Program #6.1.B: "Encourage consolidated development; with appropriate land use buffers of parks, open space and trails, for proposed major subdivisions of prime agricultural lands." The specific plan consolidates development within a master planned community, the East Cypress Corridor Specific Plan. The specific plan includes a system of parks, open space, lakes, and trails. The specific plan includes over 100 acres of parks, a 5-acre beach club, over 150 acres of lakes, over 160 acres of open space easements, and well over 100 acres of wetlands.

- General Plan Open Space and Conservation Element Program #6.1.E: "Continue to implement (and refine as necessary) the Right to Farm Ordinance, which protects ranchers

and farmers within an agricultural district from nuisance complaints and unreasonable restrictions and regulations on farm structures or farming practices."

The City continues to implement this ordinance and add relevant conditions of approval to entitlement resolutions requiring developers to notify potential property owners of adjacent agricultural uses and their existing impacts.

3.1.7 Discussion of Specific Plan's Potential to Result In New Significant Effects Not Considered in the General Plan EIR

Conversion of Important Farmland

(1) Impact Assessment.

The Specific Plan area comprises approximately 2,546 acres, of which approximately 866 acres are shown as prime farmland, farmland of statewide importance or unique farmland, on maps prepared by the State Department of Conservation's Farmland Mapping and Monitoring Program (FMMP). As noted above, the General Plan EIR identifies the conversion of agricultural lands assigned to one of these three categories on the FMMP farmland map as a potentially significant impact. The General Plan EIR concluded, however, that implementation of specified General Plan Programs and Policies would reduce impacts due to development of such agricultural lands within the City's Planning Area to a less than significant level.

The Specific Plan is consistent with the development area and pattern of urban uses envisioned by the General Plan and considered in the General Plan EIR. The purpose of the Specific Plan is to implement the policies of the General Plan within the East Cypress Corridor area, and those General Plan policies envision development of the area as provided by the Specific Plan. Most of the East Cypress Corridor area is identified for conversion to developed uses in the General Plan, so the conversion of farmland to developed uses contemplated by the Specific Plan is within the scope of impacts to agricultural land anticipated in the General Plan EIR. The General Plan EIR did not, however, include a site specific assessment of impacts to agricultural land within the East Cypress Corridor Area. Accordingly, the discussion below augments the assessment of agricultural land impacts in the General Plan EIR by evaluating the specific agricultural land conversion impacts within the six Specific Plan planning areas.

Planning Areas 2 and 5. Contra Costa County approved the Summer Lake project for development in 1993. The first two phases of the project (Planning Area 5) are currently under construction. The proposed changes to Planning Area 2 of the Summer Lake plan would not have any impact on agricultural uses because none exist on the Planning Area 2 site and the site has already been graded. Inclusion of Planning Area 5 in the Specific Plan and the proposed changes to Planning Area 2 would thus have ***no impact*** on agricultural resources.

Planning Area 6. The 631 acres within Planning Area 6 consists of existing residential and agricultural uses. A total of 175 acres are identified as urban or built-up uses by the FMMP. Only 38 acres within this planning area are identified as important farmland: 8 acres of prime farmland and 30 acres of farmland of statewide importance. These lands are fragmented and have not been

used for any appreciable level of agricultural production. Therefore, impacts to important farmland in Planning Area 6 are considered ***less than significant.***

Planning Areas 1, 3 and 4. Development of the uses consistent with the Specific Plan in Planning Areas 1, 3 and 4 will convert to other uses 828 acres of land identified as important farmland on the FMMP map. As noted above, however, none of this land has been used for crop production for many years. As explained above, to qualify as one of the three FMMP categories of important farmland the land must have been used for irrigated agricultural production or cropped during the four years prior to the mapping date. Because the land has not been used for crop production within the past four years, and instead has been used for grazing, there is a question whether it should continue to be identified as one of the three categories of important farmland, or instead should be reclassified as grazing land. Nevertheless, 828 acres remains identified on the most recent map (2007) as one of the three categories of important farmland.

In order to provide a further assessment of impacts to the agricultural land in Planning Areas 1, 3 and 4, a Land Evaluation and Site Assessment (LESA) was completed for planning areas 1, 3 and 4. (See Appendix C) The LESA model is an optional method for assessing agricultural resources as an alternative to use of the farmland classifications identified in the FMMP map. Under the LESA model, a weighted score is assigned to land evaluation factors (soil resource quality based on the Land Capability Classification and Storie Index Rating) and site assessment factors (project size, availability of water, amount of surrounding agricultural land, and surrounding protected agricultural land). The analysis resulted in a LESA score of 62.

Under the LESA model, a total score of over 60 points is considered "significant" unless either the land evaluation or site assessment subscore is less than 20 points. Here, the site assessment score was 39. Due to the relatively low quality of the soils, the land evaluation subscore was 23. However, because this subscore is greater than 20, the agricultural land in these planning areas would be considered "significant" under the LESA model.

As explained above, the General Plan EIR concluded that conversion of agricultural land to developed uses consistent with the Land Use Element of the General Plan was a potentially significant impact that would be reduced to a less than significant level with implementation of the General Plan's Policies and Programs related to agricultural land. This conclusion was based upon a determination that that the referenced Policies and Programs would accomplish the goal of preserving important components of the agricultural heritage of the Oakley area.

However, as discussed in section 3.3.6, only a limited number of the General Plan's agriculture-related Policies and Programs are directly applicable within the Specific Plan area. In addition, the Policies and Programs in the General Plan clearly would not have the effect within the Specific Plan area of avoiding the loss of land classified as important farmland that would result from converting that land to developed uses.

In the particular context of the Specific Plan area, the land that is identified in the FMMP map as important farmland is not being used for production of crops. Instead, most of the land has been used for cattle grazing, and growing hay used for cattle feed. This has been the consistent pattern of use of this land for many years. Given the history of use of this land, and the relatively low quality of the soils, it does not appear to be likely that it would be used in the future for cultivation of crops

if left undeveloped. Nevertheless, because conversion of this land to other uses would result in the permanent loss of agricultural land that is identified as important farmland under the FMMP map and that qualifies as "significant" under the LESA model, the conversion of this agricultural land within Planning Areas 1, 3, and 4 is a ***significant impact.*** This significant impact warrants consideration of whether measures, in addition to the farmland-related Policies and Programs in the General Plan, might be available to mitigate this potentially significant impact.

(2) Discussion of Potential Mitigation Measures

One method of mitigating the effect of loss of agricultural land that results from converting the land to other uses would be to avoid the impact by eliminating or reducing the development planned for agricultural land. However, the land within the East Corridor Specific Plan area is designated in the land use element of the City's General Plan for developed uses. Accordingly, conversion of the agricultural land within the Specific Plan area would be consistent with the General Plan, while attempting to preserve it for agricultural use would be inconsistent with the policies in the General Plan. In addition, changing the applicable land use designations in the General Plan to agricultural, rather than developed uses would also require that the General Plan be amended to revise fundamental policies that run through virtually every one of the Plan elements.

Conversion of the agricultural land within the Specific Plan area to developed uses is also consistent with the County's 65/35 Land Preservation Standard, described above, as well as the planning and other considerations that resulted in annexation of the Specific Plan area to the City. Attempting to preserve the area for agricultural use would necessarily have the effect of displacing development to some other area. This, in turn, could result in increased pressure for development of land earmarked for preservation under the County's 65/35 Land Preservation standard, including agricultural lands. For similar reasons, changing the land uses planned for the Specific Plan area would be inconsistent with General Plan policies which provide for logical, contiguous development, and could result in undesirable discontiguous leap-frog development.

A device that has been viewed as CEQA mitigation by some agencies is the use of agricultural conservation easements over existing agricultural land. An agricultural conservation easement is a deed restriction which prohibits urban development of an agricultural parcel, usually in perpetuity, and usually in exchange for compensation. Such easements can be effective in encouraging continued agricultural production on the parcel that is subject to the easement because the payment made for the easement provides an economic subsidy to the owner of the agricultural land, and the easement prevents the owner from converting the land to a developed use. However, because placing agricultural conservation easements over other land does not replace the agricultural land that is lost when it is converted to developed uses, it cannot be viewed as compensatory mitigation under CEQA; the net loss of agricultural land is the same when agricultural land is converted to developed uses with or without an agricultural conservation easement over other agricultural land.

Furthermore, at the regional level, there is already a program in place to preserve agricultural lands within the County: the 65/35 Land Preservation Policy and the Urban Limit Line. As discussed in this SEIR, the proposed project is within the 35% area identified for urban development. The remaining 65% of the County lands, including lands near the Specific Plan area, are identified as non-urban lands. Use of agricultural conservation easements within these non-urban areas would

add a further restriction on development within an area that is already unavailable for urban development under this regional policy.

In addition, the County and four cities (Brentwood, Clayton, Oakley and Pittsburg) recently obtained approval from the U.S. Fish & Wildlife Service and California Department of Fish & Game for the East Contra Costa County Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP). While the purpose of the HCP/NCCP is to protect and manage undeveloped land as habitat for threatened and endangered species, the HCP/NCCP will conserve a significant quantity of agricultural land in Eastern Contra Costa County. The East Cypress Corridor Specific Plan is subject to the HCP/NCCP. Under the HCP/NCCP, any future development will be required to pay a per-acre fee towards the land acquisition and other goals of the HCP/NCCP. This per-acre fee is imposed on each developed acre within the Specific Plan. Of the approximate 80,000 acres targeted for acquisition by the HCP/NCCP, over 95% is classified prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, or grazing land. The identified land is located in East Contra Costa County within the area of the County identified for preservation under the County's 65/35 Land Preservation Plan.

Adoption of the Specific Plan will thus advance the long-term Countywide strategy for protection of agricultural resources in two ways: First, by allowing development in a designated development area -- the East Cypress Corridor area -- it will help to reduce pressures for growth and development in identified non-urban preservation areas, including important agricultural land within those preservation areas. And second, through the requirement that development within the Specific Plan Area fund acquisition of land to be protected under the HCP/NCCP, including important farmlands, it will help preserve the agricultural resources and agricultural character of Eastern Contra Costa County consistent with the provisions of the County's 65/35 Land Preservation Plan.

For these reasons, implementation of the Specific Plan could help to reduce the long term cumulative loss of important agricultural land in Contra Costa County. (See section 3.3.8, below) However, no mitigation measures are available that would compensate directly for, or otherwise mitigate, the loss of agricultural land due to conversion of the Specific Plan area to developed uses. Accordingly, the impact resulting from conversion of important farmland in Planning Areas 1, 3, and 4 remains a ***significant impact.***

Conflicts with existing zoning for agricultural use or with Williamson Act Contracts

Upon adoption of the Specific Plan, the Specific Plan area will be zoned to SP-1. The Specific Plan will then establish the land use plan, development standards, infrastructure requirements and implementation requirements for the SP-1 zoning. Accordingly, development consistent with the Specific Plan would have ***no impact*** to agricultural zoned land.

There is no property within the Specific Plan area or adjacent to the plan area that is in a Williamson Act contract. Therefore, the project would have ***no impact*** on Williamson Act land.

Other Changes in the Existing Environment Which Could Result in Conversion of Agricultural Land to Non-Agricultural Use

The General Plan EIR refers to the potential for other changes to the existing environment that could result from converting agricultural land in the Specific Plan area to other uses, but does not include an analysis of this issue in its discussion of agricultural land impacts. Accordingly, this SEIR evaluates whether the project may cause or otherwise result in the conversion of nearby farmland to non-agricultural uses.

Conversion of nearby agricultural land can occur as an indirect effect of development adjacent to agricultural lands; the incompatibility of land uses can be a factor that the jurisdiction with land use authority over the nearby agricultural land takes into account in determining whether to redesignate the adjoining property for nonagricultural uses.

The discussion of General Plan programs and policies relating to agricultural uses identifies General Plan policies relating to setbacks, buffers, and density changes that can be used to reduce incompatibility between development and agricultural uses. The programs also require continued implementation of the Right to Farm ordinance. (General Plan DEIR pp. 3-76 - 77.) Setbacks for residential development adjacent to agricultural lands, and incorporating parks, open space and trails between urban and agricultural uses are also identified in the General Plan EIR as methods for reducing conflicts with the discussion of land use impacts. (General Plan DEIR p. 3-17.)

The Specific Plan site is located in an area with agricultural uses to the south and southwest. There are several projects along the East Cypress Road corridor west of the site that have been approved and change agricultural land to urban development. The proposed Specific Plan reflects the current change of agricultural land to urban development that is occurring along East Cypress Road to and including the Specific Plan site, as anticipated in the 2020 General Plan.

The Summer Lake project, as already approved, would result in the ultimate development of 1,330 residences within Planning Areas 2 and 5. The approved Cypress Grove project, which is located approximately one mile west of the East Cypress Corridor Specific Plan area totals approximately 147 acres and will result in the development of 637 residential homes. The Dutch Slough project that is located south of the Contra Costa Canal and approximately one-half mile west of the site is in the planning stage and also proposes urban development consistent with the 2020 General Plan. The 1200 acres of the Dutch Slough property lying north of the Contra Costa Canal is owned by the California Department of Water Resources, which is proposing to restore its Dutch Slough property to tidally-influenced wetland habitat as part of its efforts to restore the Delta. The Dutch Slough Restoration project would eliminate any agricultural uses on that property.

The nearby agricultural lands are separated from the project area by both regulatory and physical features. The regulatory separation is the Urban Limit Line. In addition, a number of physical features serve as buffers between the Specific Plan Area and current agricultural uses. The Specific Plan Area is bounded to the south and southwest by Rock Slough and the Contra Costa Water District Canal, to the east by Sand Mound Slough, and to the north by Dutch Slough. Jersey Island Road and the proposed levee system stand between the Specific Plan Area and the 1200-acre Dutch Slough property owned by the California Department of Water Resources (DWR). New interior levees would be constructed adjacent the Contra Costa Canal and Rock Slough in the south and southwest, and along the east side of Summer Lake. On Sandmound Slough, the agricultural uses to

the east are further separated by existing uses, primarily water recreational. The new housing units in Planning Areas 2, 4 and 5 would be buffered by the low density uses in Area 6.

Nearby agricultural uses would not be significantly affected by the project because of these buffers, and those agricultural uses could continue without being adversely affected by the project. Therefore, this potential impact would be ***less than significant.***

3.1.8 CUMULATIVE EFFECTS ON AGRICULTURAL RESOURCES

Contra Costa County's Important Farmlands have declined from 102,292 acres in the year 2000, to 96,757 acres in 2004 (DOC Farmland Conversion Reports, 2002-2002 and 2004-2004). This is an annual conversion of 1,384 acres per year—slightly more than 1% per year. This is a significant cumulative impact, and was identified as such in both the Contra Costa and City of Oakley General Plan EIRs. Implementation of the Specific Plan would contribute to this significant cumulative impact.

As discussed above, two countywide programs address the cumulative loss of agricultural lands. One is the HCP/NCCP and the other is the 65/35 Land Preservation Plan (and its associated Urban Limit Line). The Specific Plan is consistent with these two programs, in that it will (a) contribute fees to the HCP, and (b) is within the development area of the Urban Limit Line. Implementation of these two countywide programs would mitigate the cumulative effect of loss of agricultural resources in the County. As explained above, however, the cumulative impact would not be reduced to a less than significant level and would remain a ***significant cumulative impact***.

3.2 AIR QUALITY

3.2.1 INTRODUCTION

As explained in Chapter 1.3, the Superior Court's decision in *Greenbelt Alliance v. City of Oakley* found that the EIR failed to adequately analyze the potentially significant air quality impacts arising from the project's area sources emissions. Section 3.4.3.2 of the EIR includes an analysis of post-construction emissions of criteria air pollutants (Reactive Organic Gases, Nitrogen Oxides and PM_{10}) associated with project vehicle use but does not include data for area source emissions of criteria air pollutants. The following discussion supplements the discussion of Impact 3.4.3.2 in the EIR by addressing area source emissions. It also supplements the discussion in the EIR by including an analysis showing total project emissions from area sources combined with emissions from project vehicle use.

For this supplemental analysis, area source emissions were quantified using the URBEMIS-2007 program (Version 9.2.2). The URBEMIS program identifies 5 categories of area source emissions. Four of those categories are associated with project land uses:

- Natural Gas Combustion
- Hearth Emissions
- Landscaping Emissions
- Architectural Coating

Natural gas combustion is primarily a source of NOx. Hearth emissions contribute to emissions of ROG, NOx and $PM_{10}/PM_{2.5}$, although since these emissions occur in winter the ROG and NOx emissions do not contribute to the formation of ozone. Landscape emissions contribute mostly to ROG, as do architectural coating emissions.

A fifth category, consumer products, results in area source emissions independent of a particular land use or development project. This emission consists entirely of ROG and is directly related to population. Although such emissions are population-based, they are included as project-related emissions in the analysis set forth below.

Natural gas emissions result from the combustion of natural gas for cooking, space heating and water heating. Estimates are based on the number of residential land uses and the number and size of nonresidential land uses.

Hearth emissions consist of emissions from wood stoves, wood fireplaces, and natural gas fireplaces related to residential uses. The URBEMIS program utilizes county-wide statistics for fuel consumption and the percentage of homes utilizing each type of fireplace. The percentages can be modified to determine the effect, for example, of eliminating wood fireplaces or eliminating wood burning altogether.

URBEMIS calculates emissions from fuel combustion and evaporation of unburned fuel by gasoline powered landscape maintenance equipment. Equipment in this category includes lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used in

residential and commercial applications. This category also includes air compressors, generators, and pumps used primarily in commercial applications.

Consumer product emissions are generated by a wide range of product categories, including air fresheners, automotive products, household cleaners and personal care products. Emissions associated with these products primarily depend on the increase in population in the area associated with residential development.

Architectural coating emissions result from the evaporation of solvents contained in paints, varnished, primers and other surface coatings associated with maintenance of residential and nonresidential structures. This category of emission is associated with operation of project land uses rather than with initial construction of the project. The default assumption is that 10% of home and commercial structure owners will paint their structures each year. The URBEMIS program utilizes VOC (volatile organic compounds) content limits as they have been specified by each air district.

The statewide California Air Resources Board's Consumer Products Program reduces the amount of reactive organic gases that are emitted from the use of consumer products in homes and institutions. "Consumer product" means a chemically formulated product used by household and institutional consumers, including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. The program requires manufacturers of specific products to reformulate or modify products to reduce emissions of ozone precursors.

Architectural coatings are coatings applied to stationary sources and their appurtenances, to portable buildings, to pavements, or to curbs. Beginning in the mid-1970s, the Air Resources Board (ARB) and air districts began developing source specific rules such as rules for individual coating sources like architectural coatings. The BAAQMD's Regulation 8, Rule 3 imposes restrictions on the formulation of architectural coatings for sale or used in the District to reduce emissions of ozone precursors.

As in the 2005 EIR, the URBEMIS program was used to quantify emissions of ROG, NOx, and PM_{10}, the three regional pollutants for which quantified thresholds of significance have been established by the BAAQMD.

3.2.2 GENERATION OF CRITERIA AIR POLLUTANT EMISSIONS IN EXCESS OF THE BAAQMD ANNUAL OR DAILY THRESHOLDS

Post Construction (Operational) Area-Source Emissions

Land use projects generate area source emissions. Area sources are sources that individually emit fairly small quantities of air pollutants, but which cumulatively may represent significant quantities of emissions. The URBEMIS-2007 program quantifies five types of area source emissions: natural gas combustion, hearth emissions, landscape equipment, architectural coatings and consumer products. Some of these area sources vary seasonally. The URBEMIS-2007 program was used to quantify emissions separately for summer and winter. Summertime emissions were utilized for reactive organic gases (ROG) and oxides of nitrogen (NO_x), as both are ozone precursors (ozone is a

summer time pollutant). Winter emissions were utilized for PM_{10} when emissions of this pollutant are at a maximum, primarily due to hearth emissions.

The incremental daily emission increase associated with project area source emissions is identified in Table 3.2-1 for reactive organic gases and oxides of nitrogen (two precursors of ozone) and PM_{10}. The BAAQMD has established regional CEQA thresholds of significance for ozone precursors and PM_{10} of 80 pounds per day, applicable to vehicular emissions (the primary source of air pollutant emissions associated with project operations). The BAAQMD does not have a separate threshold of significance for area source emissions because area sources are not usually the primary sources of pollutant emissions during project operations. In the absence of such a standard, the 80 pounds per day threshold has been applied to area source emissions, as shown in Tables 3.2-1 and 3.2-2 and to the sum of mobile source and area source emissions as shown in Table 3.2-3.

As shown in Table 3.2-1, the estimated area source emissions for the project (both mitigated and unmitigated) would exceed the threshold of significance for ROG and PM_{10}. Therefore, the project's area source emissions would have a ***significant*** impact on regional air quality.

Table 3.2-1
Project Area Source Emissions in Pounds Per Day

Project	Reactive Organic Gases	Nitrogen Oxides	PM_{10}
East Cypress Corridor SP	276.1	55.7	327.5
Summer Lake Changes	9.3	2.4	9.8
Total (Unmitigated)	285.4	58.1	337.3
Total (Mitigated)	278.9	54.9	2.7
Significance Threshold	80.0	80.0	80.0

Mitigation Measures

The following measures shall be implemented to reduce the project's area source emissions.

Post Construction (Operations) Area Source Emissions

Mitigation Measure 3.2-1 In addition to Mitigation Measures 3.4-1 and 3.4-2 in the EIR, all development shall be required to implement the following measures for reducing area source emissions:

- Eliminate wood burning fireplaces or devices. Install a gas outlet in proposed outdoor recreational fireplaces or pits. Offer as an option on homes to install a gas outlet for use with outdoor cooking appliances, such as a gas barbeque.
- Use efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units that meet or exceed Title 24 requirements (Title 24, Part 6, Energy

Efficiency Standards for Residential and Nonresidential Buildings). Use window glazing and insulation, wall insulation, and efficient ventilation methods.

- Install electrical outlets on the exterior walls of both the front and back of all commercial buildings and residences to promote the use of electric landscape maintenance equipment.
- Landscape with drought resistant and low maintenance species of plants, trees, and shrubs to reduce the demand for gas powered landscape maintenance equipment.
- Use low VOC and low formaldehyde architectural coatings and insulation. Provide educational materials to homebuyers about the environmental benefits of using low VOC architectural coatings to help promote consumer use.
- Provide a 220-volt utility drop or other dedicated outlet that is adaptable for use by electric or rechargeable hybrid vehicles that are generally available to consumers.

Mitigation Measures 3.4-1 and 3.4-2 have the potential to reduce project-related *mobile source* emissions by 10-20%. In addition, as shown on Table 3.2-1, the above mitigation measures will mitigate area source emissions. The effectiveness of area source mitigation measures was calculated by the URBEMIS-2007 program with the following assumptions:

1. All wood-burning emissions would be eliminated.
2. Energy conservation measures would reduce natural gas consumption by 5%.
3. Landscaping equipment measures would reduce emissions from this source by 20%.
4. No quantifiable reductions can be assumed for measures to address consumer products and architectural coatings because the project cannot dictate consumer choice by future home buyers.

The effectiveness of mitigation measures in reducing area sources would vary by pollutant. Operational mitigation measures would reduce area source emissions of reactive organic gases by 2.3%, emissions of oxides of nitrogen by 5.4%, and emissions of PM_{10} by over 99% (largely due to the elimination of wood burning fireplaces or devices).

Even with reductions of this magnitude, residual emissions of ozone precursors and PM_{10} would remain well above the stated significance threshold of 80 pounds per day. Even with implementation of the mitigation measures the project would have ***significant*** air emission impacts.

The relative ineffectiveness of proposed mitigation for area source emissions of reactive organic gases is due to the fact that these emissions are dominated by consumer product and architectural coatings emissions. These two categories are responsible for over 87% of the calculated area source emissions of reactive organic gases, but there are no effective or enforceable mitigation measures available at the individual project level. Both of these sources are controlled by consumer decisions made by future residents, which the project's design cannot influence. However, both sources of emission, as explained above, are regulated and controlled at the state and air district level, so that

consumer products and architectural coatings available to project residents are designed to reduce emissions.

Summer Lake – Supplemental Impact

The incremental daily area source emission increase associated with the changes in Summer Lake land uses from the land uses originally approved as part of the Summer Lake EIR has been estimated using the URBEMIS-2007 program and is identified in Table 3.2-2 for reactive organic gases and oxides of nitrogen (two precursors of ozone) and PM_{10} . This information is set forth separately here so as to provide an analysis of the incremental impacts of the changes to Summer Lake. These data for Summer Lake are incorporated in Table 3.2.1, above, and therefore are included in the estimates of total project-related area source emissions.

Table 3.2-2
Summer Lake Area Source Emissions in Pounds Per Day

	Reactive Organic Gases	**Nitrogen Oxides**	**PM_{10}**
Area Sources	9.3	2.4	9.8
Significance Threshold	80.0	80.0	80.0

Mitigation Measures

The following mitigation measures shall be implemented by Summer Lake:

Mitigation Measure 3.2-2 See Mitigation Measures 3.4-1, 3.4-2 of the EIR and 3.2-1 above.

The incremental impact of area source emission associated with the changes in land use at Summer Lake would be less than significant.

Analysis of Post Construction (Operational) Area-Source Emissions Combined with Vehicle Emissions

As explained in the EIR, vehicle trips generated by the project would result in air pollutant emissions affecting the entire San Francisco Bay Air Basin. Mobile-source emissions associated with project vehicle use were calculated for the EIR using the URBEMIS-2002 emission model, and were recalculated for this supplement using the URBEMIS-2007 emission model, because of changes to the model discussed below.

In order to provide an overall estimate of the project's total air emissions, the project's area sources are totaled together with the project's mobile source emissions in the following table. When combined with mobile source emissions, the estimated operational emissions for the project (both mitigated and unmitigated) as shown in Table 3.4-9 would exceed the thresholds of significance for

ROG, NOx and PM_{10}. Therefore, the proposed operations of the project would have a ***significant*** impact on regional air quality.

Table 3.2-3
Total Project Emissions in Pounds Per Day from URBEMIS-2007 Program

Project	Reactive Organic Gases	Nitrogen Oxides	PM_{10}
Mobile Sources			
East Cypress Corridor SP	340.1	392.7	954.9
Summer Lake Changes	16.3	21.6	25.8
Sub-Total	356.4	414.3	980.7
Area Sources			
East Cypress Corridor SP	276.1	55.7	327.5
Summer Lake Changes	9.3	2.4	9.8
Sub-Total (Unmitigated)	285.4	58.1	337.3
Sub-Total (Mitigated)	278.9	54.9	2.7
Grand Total (Unmitigated)	641.8	472.4	1318.0
Grand Total (Mitigated)	635.3	469.2	983.4
BAAQMD Significance Threshold	80.0	80.0	80.0

Note that the data for mobile source emissions shown in Table 3.2-3 above are somewhat higher than shown in the EIR. (See mobile source data in Tables 3.4-5 and 3.4-6 of the EIR at pages 3.4-9 and 3.4-11.) Since preparation of the EIR, the program for modeling area and mobile sources has been updated from the URBEMIS-2002 program to the URBEMIS-2007 program. The difference is not due to any change in the project or anticipated project trip generation, but rather the fact that the URBEMIS-2007 program utilizes trip length assumptions that differ from those used in the URBEMIS-2002 program. Specifically, the URBEMIS-2002 program used aggregated estimated vehicle trip lengths from throughout the 9-county Bay Area Air Quality Management District while the URBEMIS-2007 program relies on estimated vehicle trip lengths specific to each county, resulting in higher assumed average trip length for some trip types for projects in Contra Costa County than under the URBEMIS-2002 program.

In addition, it should be noted that URBEMIS-2007, unlike URBEMIS-2002, provides estimates of $PM_{2.5}$ emissions. $PM_{2.5}$ refers to particulate less than 2.5 microns in size while PM_{10} refers to particulate less than 10 microns in size so the data for PM_{10} also include $PM_{2.5}$. The BAAQMD CEQA Guidelines, however, do not yet provide a quantified mass emission threshold of significance for $PM_{2.5}$ separate from the threshold for PM_{10}. Measures designed to address PM_{10} are also effective for PM_{25} URBEMIS-2007 estimates that total unmitigated emissions of $PM_{2.5}$ for the

project would be 512.0 pounds per day. With proposed mitigation measures the emissions would be reduced to 190.0 pounds per day.

Mitigation measures for these air pollution impacts are set forth in the EIR and in the discussion of area source emissions above. Even with implementation of these mitigation measures the project would have ***a significant*** operational air emission impacts when the combined effect of mobile source and area source emissions is considered.

4.0 EIR AUTHORS/PERSONS CONSULTED

City of Oakley - Lead Agency

Bryan Montgomery	City Manager
Rebecca Willis	Community Development Director
Kenneth Strelo	Senior Planner

Environmental Consultant - Phil Martin & Associates, Inc.

Phil Martin	Principal

Air Quality Consultant - Don Ballanti and Associates

Don Ballanti	Principal

Agricultural Land Consultant - Environmental Science Associates

Brian Grattidge	Planner/CEQA Specialist

APPENDICES

APPENDIX A

Notice of Preparation and Initial Study

NOTICE OF PREPARATION
FOR THE EAST CYPRESS CORRIDOR SPECIFIC PLAN

To: OPR, Responsible and Trustee Agencies, and Interested Parties

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report (SEIR)

Project Title: East Cypress Corridor Specific Plan

Notice if hereby given that the City of Oakley, as the Lead Agency, will prepare a Supplemental Environmental Impact Report (SEIR) for the East Cypress Corridor Specific Plan.

The Final Environmental Impact Report for the East Cypress Corridor Specific Plan (SCH # 2004092011) was certified by the City Council of the City of Oakley on March 13, 2006. On the same date the City Council adopted the East Cypress Corridor Specific Plan and other actions and approvals relating to the Specific Plan.

The SEIR is being prepared in response to a Judgment issued by the Superior Court of the State of California, County of Contra Costa, granting a Peremptory Writ of Mandate in the case of *Greenbelt Alliance v. City of Oakley*, Case Number MSN06-0582. The Peremptory Writ of Mandate ordered the City Council to set aside various actions and approvals relating to the East Cypress Corridor Specific Plan, including its resolution certifying the Final Environmental Impact Report. The Peremptory Writ of Mandate further ordered that two legal deficiencies in the Final Environmental Impact Report be corrected in accordance with the Decision that was issued by the court: (i) the failure to comply with the tiering provisions of CEQA with respect to the EIR's discussion of impacts to agricultural resources; and (ii) analysis of the potentially significant air quality impacts of the Project's area source emissions. With the exception of these two legal deficiencies, the Judgment provides that in all other respects the petition for writ of mandate challenging the Final Environmental Impact Report is denied.

The Supplemental Environmental Impact Report is being prepared as a supplement to the Final Environmental Impact Report for the East Corridor Specific Plan to address the two legal deficiencies in the Final Environmental Impact Report described above. Copies of the Initial Study, the Judgment, the Peremptory Writ of Mandate, and the Court's Decision are available from the City of Oakley Community Development Department at the address set forth below.

The City is requesting comments as to the contents of the Supplemental Environmental Impact Report that are relevant to your agency's/party's statutory responsibilities or interest in connection with the proposed project.

The project description, location, probable environmental impacts, and other information relating to the project, are contained in the Initial Study attached to this Notice of Preparation.

Due to the time limits mandated by State law, your response should be sent at the earliest possible date, but not later than 30 days after receipt of this notice. Please send your response to:

City of Oakley
Attn: Rebecca Willis, Community Development Director
3231 Main Street
Oakley, CA 94561

Scoping Meeting: The City of Oakley will conduct a Scoping Meeting to consult directly with the interested agencies and members of the public in regards to the contents of the Supplemental Environmental Impact Report. The Scoping Meeting will be held on November 14, 2007, at 6:00 pm at 204 Second Street, Oakley, CA 94561 (also known as "The White House"). Members of the public and interested agencies will have the opportunity at this time to submit comments on the scope and contents of the Supplemental Environmental Impact Report. If you have questions about the time and place of the Scoping Meeting please contact Ms. Rebecca Willis.

Date: October 26, 2007

Signature: _____

Rebecca Willis, Community Development Director
Telephone: (925) 625-7000

CITY of OAKLEY
A PLACE for FAMILIES in the HEART of the DELTA

EAST CYPRESS CORRIDOR SPECIFIC PLAN
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
INITIAL STUDY

I. BACKGROUND

The City of Oakley certified a Final Environmental Impact Report (Final EIR) and adopted the East Cypress Corridor Specific Plan and other actions and approvals related to the Specific Plan on March 13, 2006.

A Judgment was issued on August 24, 2007 by the Superior Court of the State of California, County of Contra Costa, in the case of *Greenbelt Alliance v. City of Oakley*, Case Number MSN06-0582 ordering issuance of a Peremptory Writ of Mandate requiring that the City Council set aside certain actions and approvals relating to the East Cypress Corridor Specific Plan, including its resolution certifying the Final EIR. The Peremptory Writ of Mandate ordered that two legal deficiencies in the Final EIR be corrected in accordance with the Decision issued by the court: (i) the failure to comply with the tiering provisions of CEQA with respect to the EIR's discussion of impacts to agricultural resources; and (ii) analysis of the potentially significant air quality impacts of the Project's area source emissions. With the exception of these two legal deficiencies, the Judgment provides that in all other respects the petition for writ of mandate challenging the Final Environmental Impact Report is denied. A copy of the Judgment Granting Peremptory Writ of Mandate, Writ of Mandate and Decision of the Court is attached as Appendix A of this Initial Study.

To comply with the Peremptory Writ of Mandate, the City of Oakley is preparing a Supplement to the Final EIR (SEIR).

A copy of the East Cypress Corridor Specific Plan Final EIR previously certified by the City and the East Cypress Corridor Specific Plan is available for public review at the City of Oakley, 3231 Main Street, Oakley, CA 94561, telephone (925) 625-7000.

II. PROJECT INFORMATION

1. *Project Title:* East Cypress Corridor Specific Plan

2. *Lead Agency Name and Address:* City of Oakley
3231 Main Street
Oakley, CA 94561

3. *Contact Person and Phone Number:* Rebecca Willis
Community Development Director
City of Oakley
(925) 625-7000

4. *Project Location:* Cypress Road east of Jersey Island Road
City of Oakley
Contra Costa County

5. *Project Sponsor's Name and Address:* City of Oakley
3231 Main Street
Oakley, CA 94561
(925) 625-7000

6. *General Plan Designations:* Single Family Residential High
Single Family Medium
Single Family Low
Single Family Very Low
Multi-Family Low
Commercial
Commercial Recreation
Agricultural Limited
Parks and Recreation
Public and Semi-Public

7. *Project Description Summary:*

The project site is located in eastern Contra Costa County as shown in Figure 1, Regional Location Map. More specifically, the project is located in the northeastern portion of the City of Oakley as shown in Figure 2, Local Map.

The East Cypress Corridor Specific Plan contemplates development of 2,546-acres of land with mixed-uses, including residential, commercial, and public utilities. The East Cypress Corridor Specific Plan site is located within the City of Oakley and is referred to in the Oakley General Plan as part of the Cypress Corridor Expansion Area. There are residences scattered throughout the site and along the levee on the north and east project boundary. Existing agricultural activity within the Specific Plan Area is limited to cattle grazing. There are several utility easements (overhead power transmission lines and natural gas lines) on the site with the power transmission lines being a prominent feature. The 1,330-unit Cypress Lakes development previously approved by Contra Costa County

is located within the boundary of the East Cypress Corridor Specific Plan and the first phase of development is under construction.

The East Cypress Corridor Specific Plan contemplates development of up to 3,585 residential units, 1,036,728 square feet of commercial use, 232 acres of public and semi-public use, five acres of Delta recreation, and 19 acres of parkland based on the uses allowed by the Oakley General Plan. Currently there are approximately 530 existing residential units in the project area and another 1,330 units that will be constructed upon build out of the Cypress Lakes project. The project would also extend existing trail systems to connect with the site and construct new utilities (sewer, water, natural gas, electricity, storm drains). The proposed land uses for the site are shown in Section 4 of the East Cypress Corridor Specific Plan. The Specific Plan will implement the land uses for the site set forth in the adopted City of Oakley General Plan. The SP (Specific Plan) zoning of the site will include zoning designations corresponding to the land uses in the Specific Plan.

III. SOURCES

The following documents were referenced as information sources utilized by this analysis. These documents are available for review at the City of Oakley, Community Development, 3231 Main Street, Oakley, California.

1. Superior Court of the State of California, County of Contra Costa, California, County of Contra Costa, Judgment Granting Peremptory Writ of Mandate, Peremptory Writ of Mandate and Decision in the case of *Greenbelt Alliance v. City of Oakley*, Case Number MSN06-0582.
2. East Cypress Corridor Specific Plan Final EIR, March 16, 2006.
3. City of Oakley 2020 General Plan, City of Oakley, Adopted December 16, 2002, City of Oakley 2020 General Plan Environmental Impact Report, City of Oakley, September 2002.
4. East Cypress Corridor Specific Plan.
5. Figure 1, Regional Location Map
6. Figure 2, Local Map
7. Figure 3, Proposed East Cypress Corridor Land Use Plan

IV. ENVIRONMENTAL ISSUES TO BE ADDRESSED

(1) Failure to comply with the tiering provisions of CEQA with respect impacts to agricultural resources; On this issue the Court found in its Decision that:

> [T]he City failed to proceed in the manner required by law and abused its discretion by its failure to comply with Public Resources Code section 21094(e). Therefore, for purposes of tiering, the City may not rely upon the Oakley 2020 General Plan. "When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or

negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR. (Guidelines, §15152, subd. (g); §21094, subd. (e)).”

These deficiencies in the Final EIR will be corrected in the SEIR. The Project will result in conversion of land currently in grazing use to nonagricultural uses, consistent with the General Plan’s land use policies relating to the site. Approximately 940 acres within the 2,546 acres with the Specific Plan area are shown on the Department of Conservation’s Farmland Map as Prime, Statewide Importance or Unique Farmland. However, none of this land has been used for purposes other than grazing for a number of years. The EIR for the Oakley 2020 General Plan found that impacts to agricultural resources from implementation of the Plan would be less than significant. The Oakley General Plan Land Use Diagram designates the site for uses such as residential, commercial, utility energy, business park, commercial recreation, public and semi-public and agricultural limited. The SEIR will include a discussion and analysis of the Project’s impacts to agricultural resources which will evaluate whether the project will result in significant impacts to agricultural resources on or near the site that were not examined in the Environmental Impact Report for the Oakley 2020 General Plan. If any such impacts are identified, it will also provide a discussion and analysis of any such impacts. If no such impacts are identified, the SEIR will incorporate and rely on the findings of the EIR for the Oakley 2020 General Plan with respect to the Project’s potential impacts to agricultural resources.

(2) Analysis of air quality impacts of the Project’s area source emissions. On this issue the Court found in its Decision that “the EIR failed to adequately analyze the potentially significant air quality impacts of the Project’s Area Source Emissions.” This finding was based on the fact the Final EIR did not contain an analysis of the Project’s area source emissions.

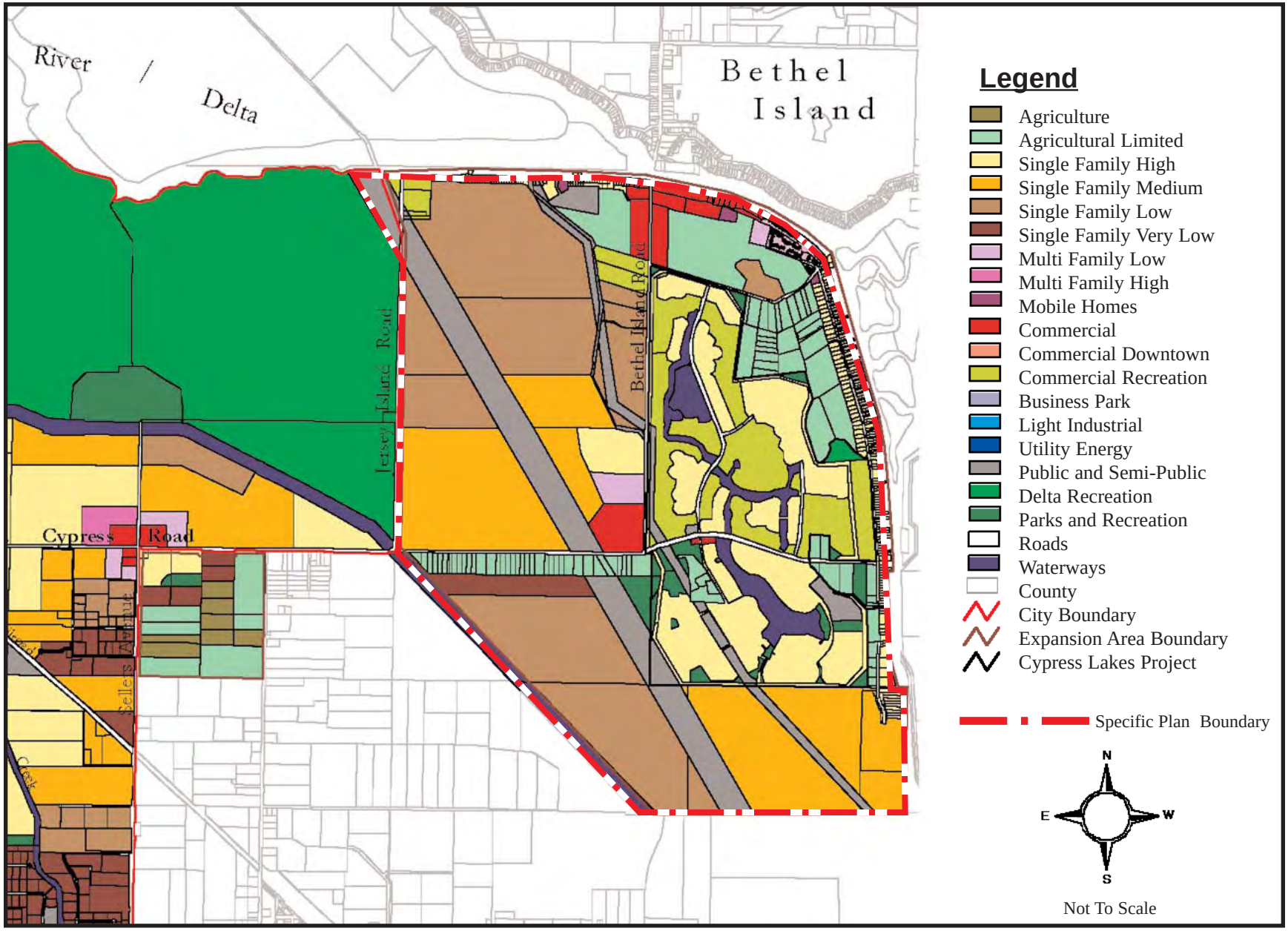
This deficiency in the Final EIR will be corrected in the SEIR. The SEIR Air Quality section will include a discussion and analysis of area source emissions projected to result from the Project based upon emissions modeling.

October 26, 2007

Rebecca Willis
Community Development Director
City of Oakley

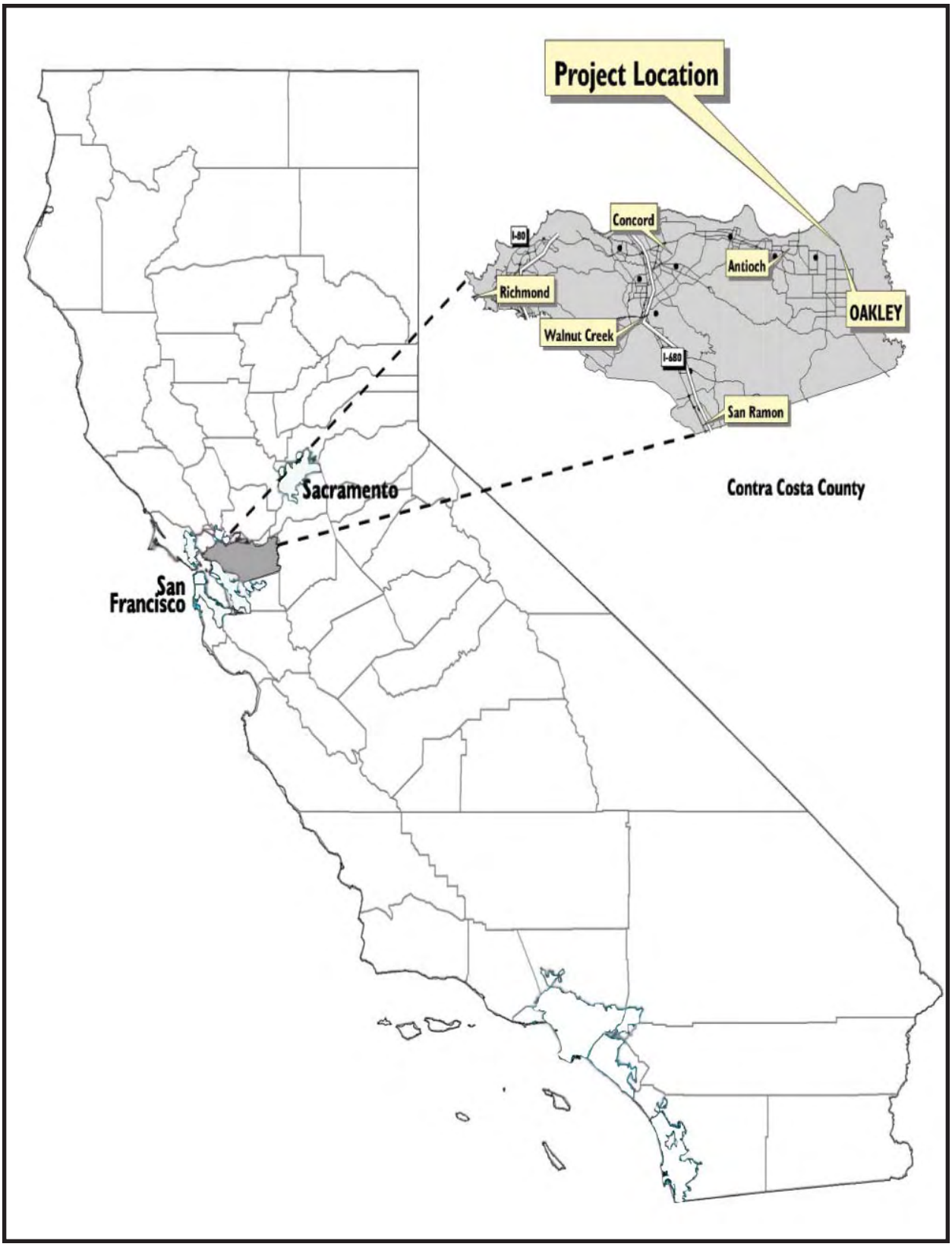
APPENDIX B

Figures Referenced in SEIR



Source: City of Oakley 2020 General Plan

Figure 2-2
Oakley 2020 General Plan Land Use Designations

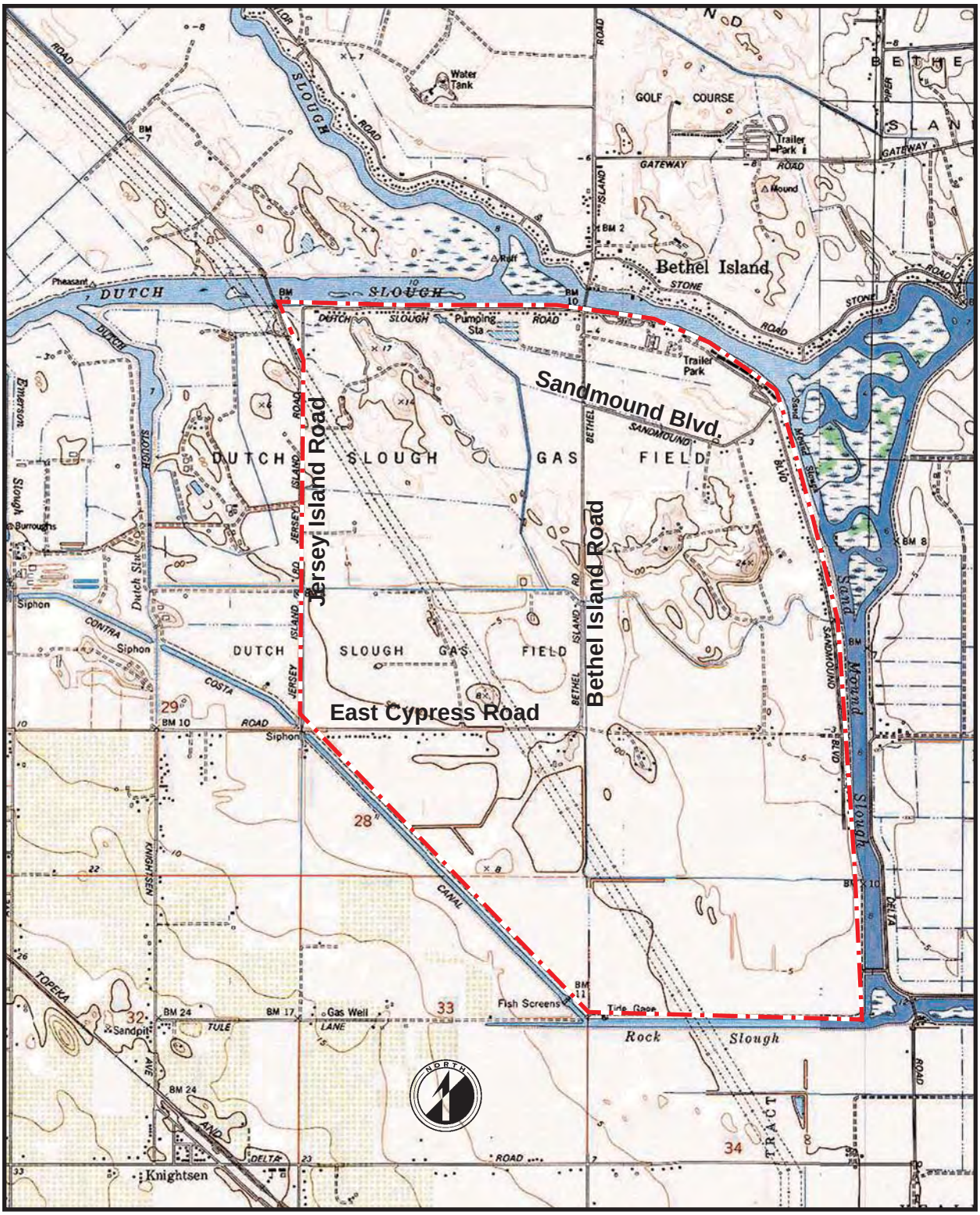


Source: City of Oakley, 2005

Figure 1-1
Regional Location Map

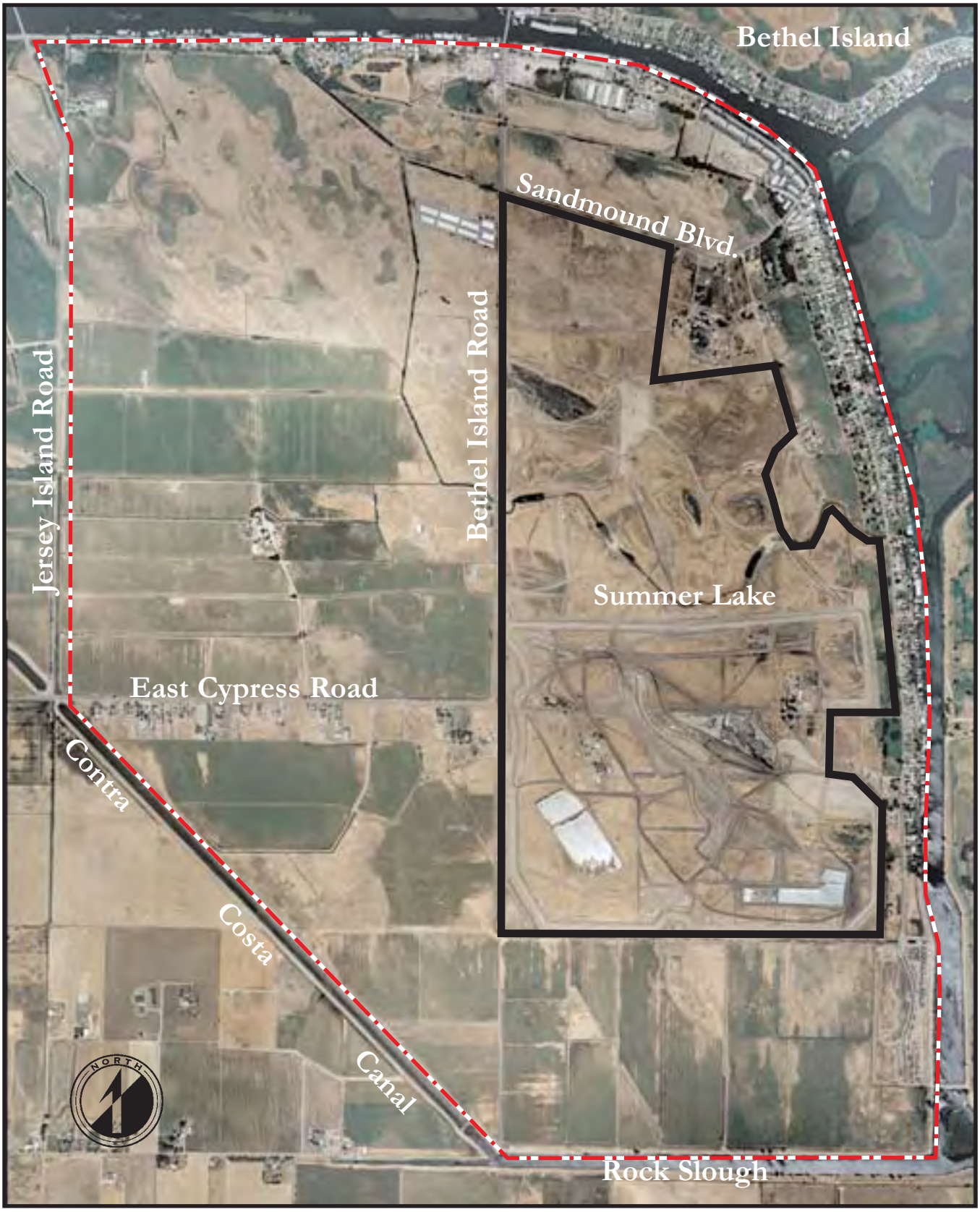
Source: Phil Martin & Associates, 2005

Figure 1-2
Local Vicinity Map



Source: 2001 USGS Topographic Maps and Phil Martin & Associates, 2005

Figure 1-3
USGS Topographic Map

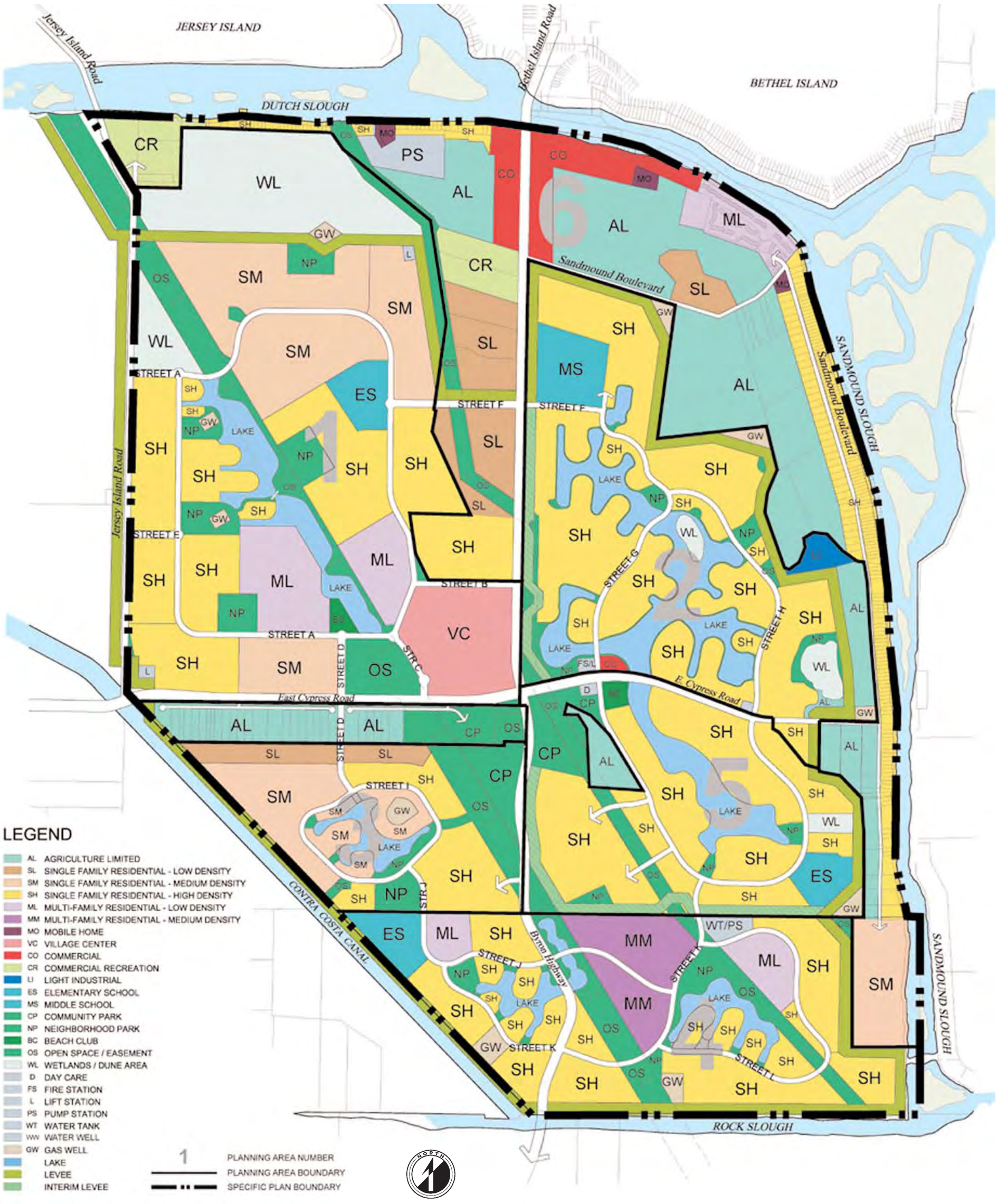


Summer Lake Boundary

Project Boundary

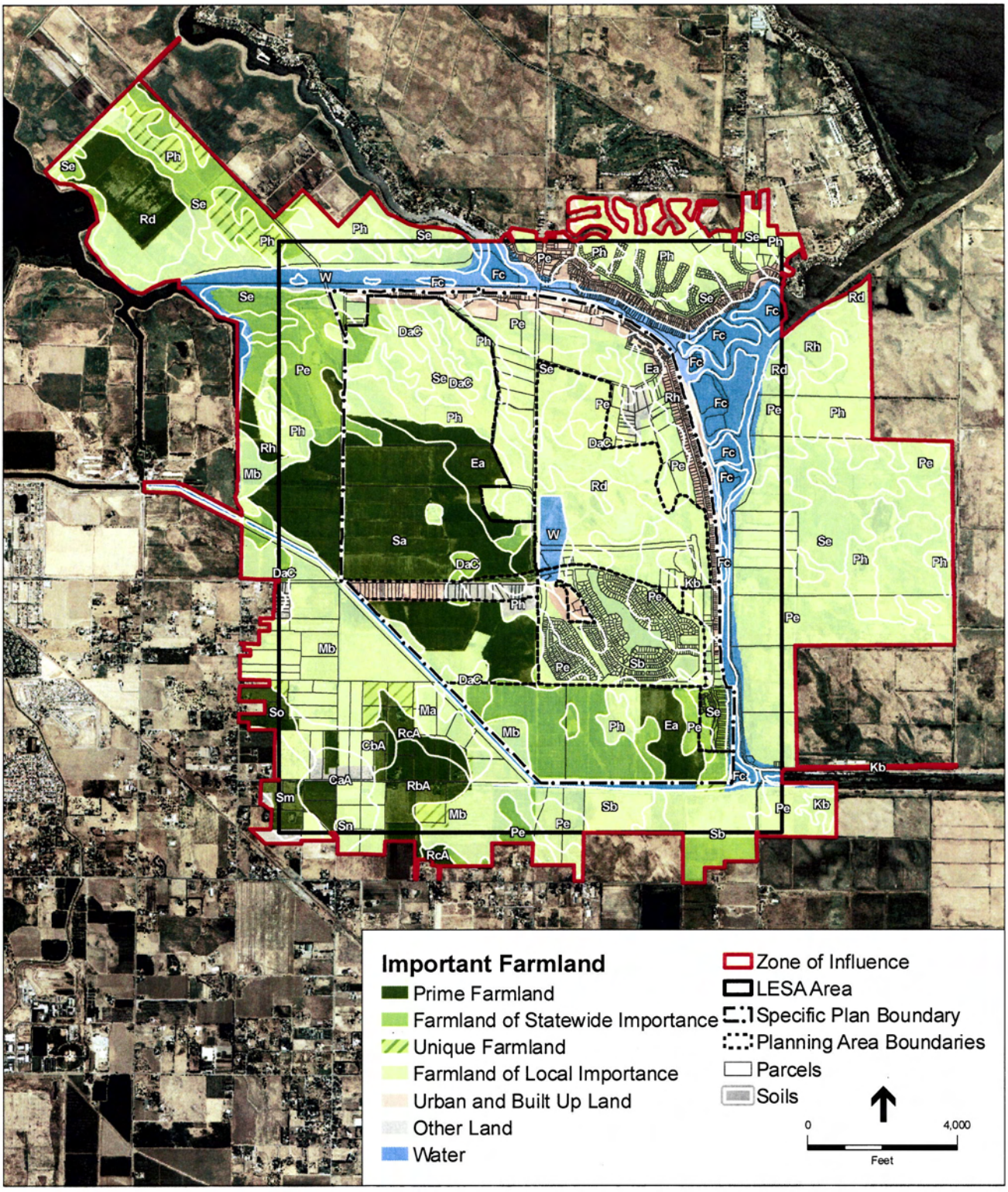
Source: McLarand, Vasquez, Emsiek & Partners, Inc., 2005

Figure 1-4
Aerial Photograph



Source: City of Oakley and McLarand, Vasquez, Emsiek & Partners, Inc., 2005

Figure 1-5
East Cypress Corridor Specific Plan
Land Use Plan Map



Oakley Agricultural Impact Analysis . 207754

SOURCE: FMMP, 2007; SSURGO, 2002, Contra Costa County, 2007; and ESA, 2007

Figure 1
Soils and Important Farmlands

APPENDIX C

Background Information Relating to Agricultural Resources

APPENDIX C

Agricultural Land Classifications

1. Description of Farmland Mapping and Monitoring Program Classification System

The Farmland Mapping and Monitoring Program administered by the State Department of Conservation employs Land Inventory and Monitoring criteria to classify the suitability of land for agricultural production. The criteria include information relating to agricultural productivity of the soils on the site based on the Soil Capability Classification System and the Storie Index Rating System. (The soil classifications used under these two systems are described below). The criteria also include various physical conditions such as moisture regime of the soil, soil temperature range, depth of the ground water table, flooding potential, erodibility, permeability, rock fragment content and rooting depth. In addition, whether the property has been used for irrigated or non-irrigated agricultural production within the preceding four years is also considered.

Important Farmland Maps for California are compiled by the State Department of Conservation using these criteria together with land use information. The Important Farmland Maps use seven categories for classifying land: prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, grazing land, urban and built-up land and other land. The first three categories (prime, statewide, and unique farmlands) are considered "important farmland" and also meet the definition of agricultural land under CEQA (Section 21060.1). Each is summarized below, based on the Department of Conservation's *A Guide to Farmland Mapping and Monitoring Program* (2004) (the "*Guide to Farmland Mapping*")

Prime Farmland: Farmland with the best combination of physical and chemical features able to sustain the long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Farmland of Statewide Importance: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Unique Farmland: Farmland of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

Farmland of Local Importance: Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.

Grazing Land: Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

Urban Land and Built-Up Land: Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land: Land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

The *Guide to Farmland Mapping* also recognizes a category referred to as "Land committed to Nonagricultural Use." This category refers to existing farmland, grazing land, and vacant areas which have a permanent commitment for development. Land Committed to Nonagricultural Use represents a planning area designated for future nonagricultural development that is not reversible by a simple majority of the City Council or Board of Supervisors. It includes land that has received a discretionary approval of a subdivision map or development agreement, or similar entitlements. Cities and Counties furnish information on Land Committed to Nonagricultural Use on a voluntary basis.

2. Description of Farmland Soil Productivity Classifications

The United States Department of Agriculture, Natural Resource Conservation Service uses two systems to determine a soil's agricultural productivity: the Soil Capability Classification System and the Storie Index Rating System.

a. Soil Capability Classification System

The Soil Capability Classification System takes into consideration soil limitations, the risk of damage when soils are used, and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils, which are unsuitable for agriculture. Generally, as the rating of the capability classification system increases, the yields and profits are difficult to obtain. A general description of soil classification, as defined by the NRCS, is provided in Table 3.3-1, Soil Capability Classification.

Table 3.3-1
Soil Capability Classification

Class	*Definition*
I	Soils have few limitations that restrict their use.
II	Soils have moderate limitations that reduce the choice of plants, or that require special conservation practices.
III	Soils have severe limitations that reduce the choice of plants, require conservation practices, or both.
IV	Soils have very severe limitations that reduce the choice of plants, require very careful management, or both.
V	Soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland, or wildlife habitat.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat.
VIII	Soils and landforms have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife habitat, or water supply or to aesthetic purposes.

Source: USDA Soil Conservation Service, Soil Survey of Contra Costa County, 1977.

b. Storie Index Rating System

The Storie Index Rating system ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating), which have few or no limitations for agricultural production to Grade 6 soils (less than 10), which are not suitable for agriculture. Under this system, soils deemed less than prime can function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed. The six grades, ranges in index rating, and definition of the grades, as defined by the NRCS, are provided below in Table 3.3-2, Storie Index Rating System.

Table 3.3-2
Storie Index Rating System

Grade	Index Rating	Definition
1 – Excellent	80 through 100	Soils are well suited to intensive use for growing irrigated crops that are climatically suited to the region.
2 – Good	60 through 79	Soils are good agricultural soils, although they may not be so desirable as Grade 1 because of moderately coarse, coarse, or gravelly surface soil texture; somewhat less permeable subsoil; lower plant available water holding capacity, fair fertility; less well drained conditions, or slight to moderate flood hazards, all acting separately or in combination.
3 – Fair	40 through 59	Soils are only fairly well suited to general agriculture use and are limited in their use because of moderate slopes; moderate soils depths; less permeable subsoil; fine, moderately fine or gravelly surface soil textures; poor drainage; moderate flood hazards; or fair

Table 3.3-2
Storie Index Rating System

Grade	Index Rating	Definition
		to poor fertility levels, all acting alone or in combination.
4 – Poor	20 through 39	Soils are poorly suited. They are severely limited in their agricultural potential because of shallow soil depths; less permeable subsoil; steeper slope; or more clayey or gravelly surface soil texture than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or poor fertility levels, all acting alone or in combination.
5 – Very Poor	10 through 19	Soils are very poorly suited for agriculture, are seldom cultivated and are more commonly used for range, pasture, or woodland.
6 – Non-agriculture	Less and 10	Soils are not suited for agriculture at all due to very severe to extreme physical limitations, or because of urbanization.

Source: USDA Soil Conservation Service, Soil Survey of Contra Costa County, 1977.

NOTES

Calculation of the Land Evaluation (LE) Score

Part 1. Land Capability Classification (LCC) Score:

(1) Determine the total acreage of the project.
(2) Determine the soil types within the project area and enter them in **Column A** of the **Land Evaluation Worksheet** provided on page 2-A.
(3) Calculate the total acres of each soil type and enter the amounts in **Column B**.
(4) Divide the acres of each soil type (**Column B**) by the total acreage to determine the proportion of each soil type present. Enter the proportion of each soil type in **Column C**.
(5) Determine the LCC for each soil type from the applicable Soil Survey and enter it in **Column D**.
(6) From the LCC Scoring Table below, determine the point rating corresponding to the LCC for each soil type and enter it in **Column E**.

LCC Scoring Table

LCC Class	I	IIe	IIs,w	IIIe	IIIs,w	IVe	IVs,w	V	VIe,s,w	VIIe,s,w	VIII
Points	100	90	80	70	60	50	40	30	20	10	0

(7) Multiply the proportion of each soil type (**Column C**) by the point score (**Column E**) and enter the resulting scores in **Column F**.
(8) Sum the LCC scores in **Column F**.
(9) Enter the LCC score in box <1> of the **Final LESA Score Sheet** on page 10-A.

Part 2. Storie Index Score:

(1) Determine the Storie Index rating for each soil type and enter it in **Column G**.
(2) Multiply the proportion of each soil type (**Column C**) by the Storie Index rating (**Column G**) and enter the scores in **Column H**.
(3) Sum the Storie Index scores in **Column H** to gain the Storie Index Score.
(4) Enter the Storie Index Score in box <2> of the **Final LESA Score Sheet** on page 10-A.

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
Totals	1230	(Must Sum to 1.0)		***LCC Total Score***	53.66	***Storie Index Total Score***	38.30

Site Assessment Worksheet 1.

Project Size Score

	I	J	K
	LCC Class I - II	LCC Class III	LCC Class IV - VIII
Total Acres		784	435
Project Size Scores		100	100

Highest Project Size Score 100

NOTES

Calculation of the Site Assessment (SA) Score

Part 1. Project Size Score:.

(1) Using **Site Assessment Worksheet 1** provided on page 2-A, enter the acreage of each soil type from **Column B** in the **Column - I, J or K** - that corresponds to the LCC for that soil. (Note: While the Project Size Score is a component of the Site Assessment calculations, the score sheet is an extension of data collected in the Land Evaluation Worksheet, and is therefore displayed beside it).
(2) Sum **Column I** to determine the total amount of class I and II soils on the project site.
(3) Sum **Column J** to determine the total amount of class III soils on the project site.
(4) Sum **Column K** to determine the total amount of class IV and lower soils on the project site.
(5) Compare the total score for each LCC group in the Project Size Scoring Table below and determine which group receives the highest score.

Project Size Scoring Table

Class I or II		**Class III**		**Class IV or Lower**	
Acreage	Points	Acreage	Points	Acreage	Points
>80	100	>160	100	>320	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
10<	0	20-39	30	40<	0
		10-19	10		
		10<	0		

(6) Enter the **Project Size Score** (the highest score from the three LCC categories) in box <3> of the **Final LESA Score Sheet** on page 10-A.

NOTES

Part 2. Water Resource Availability Score:

(1) Determine the type(s) of irrigation present on the project site, including a determination of whether there is dryland agricultural activity as well.

(2) Divide the site into portions according to the type or types of irrigation or dryland cropping that is available in each portion. Enter this information in **Column B** of **Site Assessment Worksheet 2. - Water Resources Availability**.

(3) Determine the proportion of the total site represented for each portion identified, and enter this information in **Column C**.

(4) Using the Water Resources Availability Scoring Table, identify the option that is most applicable for each portion, based upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. Enter the applicable Water Resource Availability Score into **Column D**.

(5) Multiply the Water Resource Availability Score for each portion by the proportion of the project area it represents to determine the weighted score for each portion in **Column E**.

(6) Sum the scores for all portions to determine the project's total Water Resources Availability Score

(7) Enter the Water Resource Availability Score in box <4> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 2. - Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score (C x D)
1	River Water	1.0	65	65
2				
3				
4				
5				
6				
		(Must Sum to 1.0)	***Total Water Resource Score***	65

Water Resource Availability Scoring Table

Option	Non-Drought Years			Drought Years			WATER RESOURCE SCORE
	RESTRICTIONS			RESTRICTIONS			
	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	
1	YES	NO	NO	YES	NO	NO	100
2	YES	NO	NO	YES	NO	YES	95
3	YES	NO	YES	YES	NO	YES	90
4	YES	NO	NO	YES	YES	NO	85
5	YES	NO	NO	YES	YES	YES	80
6	YES	YES	NO	YES	YES	NO	75
7	YES	YES	YES	YES	YES	YES	65
8	YES	NO	NO	NO	– –	– –	50
9	YES	NO	YES	NO	– –	– –	45
10	YES	YES	NO	NO	– –	– –	35
11	YES	YES	YES	NO	– –	– –	30
12	Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
13	Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
14	Neither irrigated nor dryland production feasible						0

NOTES

Part 3. Surrounding Agricultural Land Use Score:

(1) Calculate the project's Zone of Influence (ZOI) as follows:

(a) a rectangle is drawn around the project such that the rectangle is the smallest that can completely encompass the project area.

(b) a second rectangle is then drawn which extends one quarter mile on all sides beyond the first rectangle.

(c) The ZOI includes all parcels that are contained within or are intersected by the second rectangle, less the area of the project itself.

(2) Sum the area of all parcels to determine the total acreage of the ZOI.

(3) Determine which parcels are in agricultural use and sum the areas of these parcels

(4) Divide the area in agriculture found in step (3) by the total area of the ZOI found in step (2) to determine the percent of the ZOI that is in agricultural use.

(5) Determine the Surrounding Agricultural Land Score utilizing the Surrounding Agricultural Land Scoring Table below.

Surrounding Agricultural Land Scoring Table

Percent of ZOI in Agriculture	Surrounding Agricultural Land Score
90-100	100
80-89	95
70-79	90
65-69	85
60-64	80
55-59	70
50-54	60
45-49	50
40-44	40
35-39	30
30-34	20
20-29	10
<19	0

(5) Enter the Surrounding Agricultural Land Score in box <5> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 3.

Surrounding Agricultural Land and Surrounding Protected Resource Land

A	B	C	D	E	F	G
Zone of Influence						
Total Acres	Acres in Agriculture	Acres of Protected Resource Land	Percent in Agriculture (A/B)	Percent Protected Resource Land (A/C)	Surrounding Agricultural Land Score (From Table)	Surrounding Protected Resource Land Score (From Table)
4279	3601	0	84	0	95	0

NOTES

Part 4. Protected Resource Lands Score:

The Protected Resource Lands scoring relies upon the same Zone of Influence information gathered in Part 3, and figures are entered in Site Assessment Worksheet 3, which combines the surrounding agricultural and protected lands calculations.

(1) Use the total area of the ZOI calculated in Part 3. for the Surrounding Agricultural Land Use score.

(2) Sum the area of those parcels within the ZOI that are protected resource lands, as defined in the California Agricultural LESA Guidelines.

(3) Divide the area that is determined to be protected in Step (2) by the total acreage of the ZOI to determine the percentage of the surrounding area that is under resource protection.

(4) Determine the Surrounding Protected Resource Land Score utilizing the Surrounding Protected Resource Land Scoring Table below.

Surrounding Protected Resource Land Scoring Table

Percent of ZOI Protected	Protected Resource Land Score
90-100	100
80-89	95
70-79	90
65-69	85
60-64	80
55-59	70
50-54	60
45-49	50
40-44	40
35-39	30
30-34	20
20-29	10
<20	0

(5) Enter the Protected Resource Land score in box <6> of the **Final LESA Score Sheet** on page 10-A.

	Map Unit	Name	Acres (1)	Percent	LCC	LCC Rating	LCC Score	Storie Index	Storie Score
Areas 1,3,4	DaC	DELHI SAND, 2 TO 9 PERCENT SLOPES	45.23	0.04	IIIs	60.00	2.21	49.00	1.80
Areas 1,3,4	Ea	EGBERT MUCKY CLAY LOAM	181.83	0.15	IIIw	60.00	8.87	32.00	4.73
Areas 1,3,4	Fc	FLUVAQUENTS	0.87	0.00			0.00		0.00
Areas 1,3,4	Mb	MARCUSE CLAY	27.08	0.02	IVw	40.00	0.88	16.00	0.35
Areas 1,3,4	Pe	PIPER LOAMY SAND	95.70	0.08	IVw	40.00	3.11	32.00	2.49
Areas 1,3,4	Ph	PIPER FINE SANDY LOAM	151.81	0.12	IVe	50.00	6.17	23.00	2.84
Areas 1,3,4	Sa	SACRAMENTO CLAY	463.01	0.38	IIIw	60.00	22.59	49.00	18.45
Areas 1,3,4	Sb	SACRAMENTO CLAY, ALKALI	160.43	0.13	IVw	40.00	5.22	39.00	5.09
Areas 1,3,4	Se	SHIMA MUCK	88.27	0.07	IIIw	60.00	4.31	32.00	2.30
Areas 1,3,4	W	WATER	9.25	0.01			0.00		0.00
Areas 1,3,4	Rh	RYDE SILT LOAM	6.12	0.00	IIIw	60.00	0.30	50.00	0.25
Totals	Totals		1229.59	1.00			53.66		38.30
		total class III	784.45						
		total class IV	435.02						

Notes
(1) Planning Areas 1, 3, and 4